EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

SMARTMATIC USA CORP., SMARTMATIC)
INTERNATIONAL HOLDING B.V., and SGO)
CORPORATION LIMITED,

        Plaintiffs,

        v.

MICHAEL J. LINDELL and MY PILLOW, INC.,

        Defendants.

Case No.: 22-cv-0098-WMW-JFD

EXPERT REPORT OF PETER KENT

SEPTEMBER 22ND, 2023

EXHIBIT

692

KENT-0001

TABLE OF CONTENTS

I.   Assignment

1.   I have been engaged by Parker Daniels Kibort LLC, on behalf of Michael J. Lindell and My Pillow, Inc. ("Defendants") to review and analyze certain evidence and provide opinions relating to various issues in this case. This report summarizes my analysis and conclusions regarding these issues.

2.   The opinions I express in this report are based on my background and experience, along with my review of materials provided to me by counsel, of search results I carried out, and Web sites I reviewed in relation to this case. If called to testify, I expect to offer the opinions expressed in this report and the basis for those opinions. I may modify or supplement the opinions that I express in this report if additional evidence or information comes to my attention. I may modify or supplement my opinions in view of arguments made by any person retained by the Plaintiffs, including Plaintiffs' counsel and anyone it engages to provide opinions.

II.   My Qualifications

3.   I have been involved in social media for almost 40 years, long before the term "social media" was in use (it appeared around 1998, but didn't begin to enter into popular usage until 2007 or so). I was online in 1984, working with CompuServe and BBS systems, later with Prodigy and AOL.

4.   In 1992 I wrote the documentation and helped design the user interface for a CompuServe "navigator" program (NavCIS), an early social-media system. In 1993 I wrote the *Complete Idiot's Guide to the Internet*, followed by *The Complete Idiot's Guide to the World Wide Web* and other related titles. These books included coverage of early Internet-based social-networking tools, such as Web-based forums, Usenet newsgroups, Listserv/email-based discussion groups, Internet Relay Chat, and so on. I was also very familiar with early online communities such as GeoCities and Tripod in the late '90s. In 1994 I was a CompuServe forum moderator for WUGNET, an early social-media forum-management company.

5.   Over the years I've worked with dozens of social-media platforms, including LinkedIn (20,000+-member network; I'm also a LinkedIn Learning trainer), Facebook, Instagram, TikTok, Pinterest, Myspace, MeetUp, G+, Twitter (3,000 followers), YouTube, WhatsApp, StumbleUpon, Tumblr, delicious, Reddit, Pinterest, Telegram, Discord, and others.

6.   I have been working with computer technology since early 1979, and have been involved in a wide range of capacities within the technology business, beginning with operating computer equipment used for oil-field drilling engineering and drilling optimization purposes; then, starting in 1981, working with software-development teams (initially with the title of *Systems Analyst*), testing hardware and software systems, documenting said systems, designing user interfaces, training users, as well as installing, maintaining, and repairing systems. Since the mid-1980s, I have been involved in various additional functions in the technology business, including writing computer books, writing video-training scripts, creating Web sites, designing software, project managing software development, developing online-marketing strategies, managing online-advertising and search-engine-optimization campaigns, and more.

7.   I began working online (using mechanisms such as CompuServe and bulletin-board systems) in 1984, and on the World Wide Web in 1993 (at a time when the Web held only 130 or so Web sites); I first began registering domains and building Web sites in 1994.

8.   I have extensive experience in the e-commerce arena. In 1997 I founded Top Floor Publishing to sell Internet-related business books online through Amazon.com as well as through Top Floor Publishing's own e-commerce store, which I personally set up myself. I also founded BizBlast, an e-commerce-service provider; the company was funded by Softbank, one of the world's largest venture-capital firms, and provided small businesses with customized online stores operating on BizBlast's servers. I was also VP of Web Solutions for IC&C, a national ISP (Internet Service Provider); my department of around 60 people provided both Web-hosting and Web-development services, such as e-commerce sites. I also worked as VP of Marketing for Indigio, a Web-applications development firm with clients such as Avis, Budget

Truck Rental, Budget Rent a Car, and Dex Media (one of the nation's largest Yellow Pages companies).

9.   I am currently a consultant, author, and Principal at Peter Kent Consulting, LLC, which provides Internet-marketing and Internet-strategy consulting services to a varied client base. I have provided consulting services in this arena to Amazon, Zillow, Avvo, Tower Records, Lonely Planet, Dunn & Bradstreet, Time Warner Cable, and literally hundreds of small and medium companies, from real-estate agents to travel agents, lawyers to non-profits.

10.   My current services include assisting clients in developing online-marketing strategies, increasing traffic through search-engine marketing and optimization, designing and implementing pay-per click search-advertising campaigns, designing Web sites, developing Web-applications, and revenue transaction conversion.

11.   In addition to my industry background, I have written many books about the Internet and technology in general. My publications include seven editions of the *Complete Idiot's Guide to the Internet*, seven editions of *SEO for Dummies*, and dozens of other books about working and doing business online, including *Pay Per Click Search Engine Marketing for Dummies, How to Make Money Online with eBay, Yahoo!, and Google, Poor Richard's Web Site: Geek-Free, Commonsense Advice on Building a Low-Cost Web Site*, three books on JavaScript programming, and a book about public-key encryption.

12.   I have also written hundreds of newspaper and periodical articles, mostly in the area of technology and e-commerce, and have written and presented four video courses for LinkedIn Learning/Lynda.com on search-engine optimization and selling products through the Amazon.com marketplace. My SEO course on Udemy.com has over 38,000 students.

13.   I have served as an expert witness in the United States on numerous occasions, including on a variety of defamation cases, such as Vivera v. Bruce Cahill; Bob Agahi v. Kevin Richard Kelly; Daniel Michalow v. D.E. Shaw; Louis Bacon v. Peter Nygård; Virginia L. Giuffre v. Ghislaine Maxwell; Bradley S. Cohen v. Ross B. Hansen; Northwest Territorial Mint, S. Firebaugh; etc. These cases, and other defamation cases, all involved social-media issues.

14.   However, I have also worked in litigation involving social media in relation to other practice areas (in particular trademark infringement). For example, Pinterest v. Pintrips; Adidas America v. Fashion Nova; JUUL Labs, Inc., v. 4X Pods, Eonsmoke, LLC; RIPL Corp. vs. Google, Inc.; Opal Labs, Inc. v. Sprinklr, Inc. (trade secrets); Monster Energy Company v. Vital Pharmaceuticals (unfair business practices); Indacon, Inc. v. Facebook, Inc. (patents); Taher Scherzay v. Futuredontics, Inc./Elexity Systems, LLC (contract dispute involving social-media software), and so on. Additional details regarding my professional experience and publications, and cases in which I have testified over the last four years, are set forth in my curriculum vitae, attached as Exhibit A to this report.

III.   Compensation

15.   I am being compensated at the rate of $600 per hour for my services. The compensation is in no way tied to the outcome of this matter or my opinion.

IV.   Materials Considered

16.   In developing my opinions, I have reviewed a number of materials related to this matter, which are identified in Exhibit B hereto, along with other materials and Web sites referenced within the body of this report. I reserve the right to review and consider additional materials throughout this case and, if necessary, to supplement the opinions in this report.

V.   Background

17.   I was asked to investigate and report on the recent statements about Smartmatic between the 2020 Presidential election and February 4 2021. I reviewed various materials provided to me, and carried out independent research, interpreting those materials and the results of my research in light of my own experience as an expert in social media. My opinions are expressed in this report, to a reasonable degree of professional certainty.

18.   Note also that I have not been asked—nor am I qualified—to opine on the veracity of the various statements made by Defendants, nor those of any other party. My report focuses on the dissemination and "reach" of certain comments, by various parties, through a variety of social-media and other channels as described in this report; that is, my report examines *when* particular comments were made, and (where possible) how many Internet users may have heard those comments in podcasts or seen and heard the comments in video streams, blog posts, and social-media posts on the Internet. I am not providing an opinion regarding whether or not the comments made were true or false, nor whether they were defamatory, nor regarding any damages that may have arisen due to any particular comment or piece of content distributed via the Internet.

A.   Technical Background

19.   The following defines a variety of terms used in this report:

- *Social Media Platform:* A general term meaning a social-media system or service, such as Twitter, Facebook, Instagram, and so on, and the software used by system users to communicate with other users.

- *Feed*: A generic term for the flow of information displayed to a social-media user. When the user logs into their social-media account, they see the feed, which contains content posted by other users; they can scroll down the page to see more content. Other terms for *feed* are *timeline*, *news feed*, *recommended*, and so on.

- *Streaming:* A term used to describe the transmission of a video or audio file in a manner in which the file can be viewed or listened to *while* it is being transferred (as opposed to *downloading* a file completely and viewing or listening once the download has finished).

- *Blog:* Derived from the term *WebLog*, a blog is a written piece, an article posted to a Web site.

- *Post*: Both a noun and a verb; a piece of content published to a social-media platform is often known as a *post*; the content has been *posted* to the user's account. On Twitter the original term for a post was *tweet* (although after the rebrand the company is now using the term *post*).

- *Friends & Followers*: These terms refer to people who can see one's social-media posts, or who will be preferentially fed those posts. (The term *friend* describes a reciprocal relationship, while the term *follower* describes a non-reciprocal relationship.)

- *Reach*: The term *reach*, common in social media, is used to describe how many people are likely to have viewed or heard a particular piece of content—an article, a podcast, a video, and so on—both within a particular social-media platform and more broadly across multiple social-media platforms. (Content is often posted by the content creator on multiple social-media platforms, and is also frequently "re-posted" by viewers of the content. Someone viewing a video on Twitter, for instance, might re-post it to Facebook.)

- *Interactions*: The term *interactions* refers to the manner in which a reader, viewer, or listener may engage in some form with content delivered from a social-media platform. The following are a few common terms.

  o *Impressions:* An *impression* generally refers to when a piece of content is displayed in a user's feed. It doesn't necessarily mean that the user paid any attention to it or interacted with it in some way, only that the content was placed into the feed and thus there is a possibility that the user saw or read it.

  o *Views:* In the case of video content, a *view* describes the action of the user actually turning on and playing the video, though it doesn't mean the user viewed the entire video or paid any attention.

  o *Replies & Comments:* Most social-media platforms allow viewers of a piece of content to leave comments about—or reply to—the content.

  o *Retweets:* A retweet on Twitter occurs when the viewer of a tweet from someone they follow sends that tweet out to their own followers, in effect passing the content on to others.

  o *Quotes:* On Twitter, this is a form of retweet in which not only does the viewer pass the content on, but the viewer also adds comments of their own.

  o *Likes:* A *like* is an expression of appreciation for the content. Unlike retweets, a like doesn't directly redistribute a post; it doesn't send it to the liker's friends or followers. However, it does help distribution indirectly; the more likes a post gets the more important it is regarded by the social-media platform software, and so the more often the post is shown to other users.

  o *Bookmarks:* The user can add the content to a bookmark list so that they can return to the content later.

  o *Follows:* A *follow* occurs when someone viewing a piece of content chooses to follow the poster of the content, so the viewer will be presented with more content from that poster in the future.

  o *Pageview:* This is not a typical social-media metric. Rather, a *pageview* is a Web analytics metric; a pageview occurs when a Web page is displayed in someone's Web browser.

  o Interactions are not the same as reach; interactions are a subset of reach, because not all people who read or watch a piece of content then interact with it.

20.   In July of this year the Twitter social-media platform was partially renamed to X (the Twitter.com domain name in still in use). However, for the purpose of this report I have chosen to use the name *Twitter.* This term is most familiar to the world after 17 years of use, and is still in common use (including by one of the analysis tools I used for this report). Thus I have chosen *not* to use the terms *X,* or *Twitter/X,* or (as is sometimes heard), *X, formerly known as Twitter.* I am also using the original terms *tweet* (the name of a post on Twitter, known on X as a *post*) and *retweet* (to describe the act of reposting a tweet, known on X as a *repost*).

21.   Finally, note also that in some cases the interaction and follower numbers are not contemporaneous. Where I have contemporaneous data I use it, of course, but in some cases I could only collect data that is available at the time of writing.

22.   However, note that it is the very nature of social media that most readers or viewers of a post read it or view it within a few days of the posting date. The social-media platforms place posts into a user's feed on a chronological basis, and older posts soon fall off and are no longer displayed unless the user seeks them out.

B.   Plaintiff's Claims Concern Comments on February 5, 2021 and After

23.   Plaintiffs accuse Mr. Lindell of making defamatory statements about *other* voting-machine companies, and voting machines in general, starting in December 2020,[1] but not about Smartmatic until later. Mr. Lindell was, according to Plaintiffs, "engaged in a disinformation campaign against Smartmatic," but Mr. Lindell is not accused of mentioning Smartmatic by name during the first events cited by Plaintiffs. Rather, Mr. Lindell was making statements about voting-technology companies in general, and *other* companies—in particular Dominion:

> "In December 2020 and January 2021, after all 50 states and Washington, D.C. certified their presidential election results, Mr. Lindell launched his attack on voting technology companies. During multiple appearances (both live at rallies in

---

[1] First Supplemental Complaint and Demand for Jury Trial, ¶¶75

Washington, D.C. and online), Mr. Lindell claimed that the algorithms in voting machines were programmed to steal votes from Donald Trump and Michael Pence. Mr. Lindell and MyPillow sponsored a 20-city "March for Trump" bus tour promoting the January 6, 2021 rally in Washington, D.C. (1/26/21 BuzzFeed News, How 'The Women for America First' Bus Tour Led to The Capitol Coup Attempt (Exhibit 129).) The MyPillow logo appeared on the bus that toured around the United States. On the bus tour, Mr. Lindell was given a platform to talk about the election. He told the audiences that 'Donald Trump got so many votes that they didn't expect that it broke the algorithms in those [voting] machines.'"[2]

24.   Indeed when, on February 4, 2021, Smartmatic filed suit for defamation against various parties (Fox News, Rudolph Giuliani, Sidney Powell, Jeanine Pirro, Maria Bartiromo, and Lou Dobbs), it did not file suit against Defendants.[3] Rather, Plaintiffs state that the first date of allegedly defamatory comments by Defendants *regarding Smartmatic* was February 5th, 2021.

C.   Smartmatic Was Widely Accused of Voter Fraud and Vulnerabilities Prior to February 5, 2021

25.   As Plaintiffs acknowledge, the allegations that Smartmatic was involved in a plot to overturn the 2020 Presidential Election had been widely disseminated before Mr. Lindell made any comments naming the company:

> "After the election, Mr. Lindell heard Mr. Rudolph Giuliani's and Ms. Sidney Powell's assertions that voting election technology was manipulated. (Smartmatic v. Fox Corp., et al., N.Y. Index No. 151136/2021, Compl. at ¶¶ 89–94 (Exhibit 138).) Mr. Lindell also saw Fox News and others, such as Newsmax and OANN, broadcasting coverage about voting machine technology being hacked in favor of Joe Biden and Kamala Harris."[4]

VI.   My Opinions

26.   The following are my opinions in this case, to a reasonable degree of professional certainty. I understand that discovery is ongoing and I anticipate the need to supplement this expert report after the conclusion of discovery. I also reserve the right to amend and/or

---

[2] First Supplemental Complaint and Demand for Jury Trial, ¶¶75-77
[3] *Id.,* 228¶
[4] *Id.,* ¶70

supplement this report based on court orders, additional discovery, including third-party discovery, expert reports and other information that I become aware of subsequent to this report. If this case proceeds to trial, I anticipate creating demonstrative exhibits based on the evidence, opinions, analysis and exhibits attached to this report and/or supplemental reports.

27.   It is clear, as I explain below, that well before Mr. Lindell made the allegedly defamatory comments regarding Smartmatic described in Plaintiffs' complaint, allegations that Smartmatic was involved in election fraud had been spread far and wide on the Internet. Furthermore, a debate had been underway in the United States—for several years—concerning the risks of using electronic voting machines. As I will show, this was a bi-partisan debate, with both Republican and Democratic party members expressing concern about the security of electronic voting.

A.   The Surge Begins

28.   A sudden surge of commentary regarding Smartmatic (and other election-machine companies) began within days after the Presidential Election of November 3, 2020. As I will show later, there was a relatively low level of commentary online regarding Smartmatic during the months of 2020 leading up to the election (and indeed in previous years). Though there *was* some negative commentary—often claiming election fraud in other countries by Smartmatic, for instance, and alleging links between Smartmatic and George Soros—it wasn't until November 7, 2020 (four days after the election) that the level of commentary online rose dramatically.

29.   The following is from Google Trends, a service that allows one to ask Google to provide a chart showing the use of a specified search term over time.[5] I searched for *smartmatic*, using a date range of January 1, 2020 through February 4, 2021. The chart shows not *absolute* use—how often a search term was being used at any particular time—but rather *relative* levels of use over time, with 100 being the peak and lower levels expressed as a percentage of that peak. From this chart we can see that starting in January, all the way through to November 7, 2020,

---

[5] https://trends.google.com/trends/explore?date=2020-01-01%202021-02-04&geo=US&q=smartmatic&hl=en

Google users were searching for *smartmatic* at relatively low levels, about one percent of the peak that came a few days later.

30.   This data doesn't show how much commentary was appearing online over time (something I discuss next); rather, it shows the level of interest (and how it grew) in *smartmatic* in the minds of Google searchers. This is, of course, *related to* the amount of commentary; the more people talking about Smartmatic online the more people would see the commentary, and thus the more people who would search for the company at the Google search engine, to learn more…and the more that the commentary would grow, as people shared through social media what they learned.
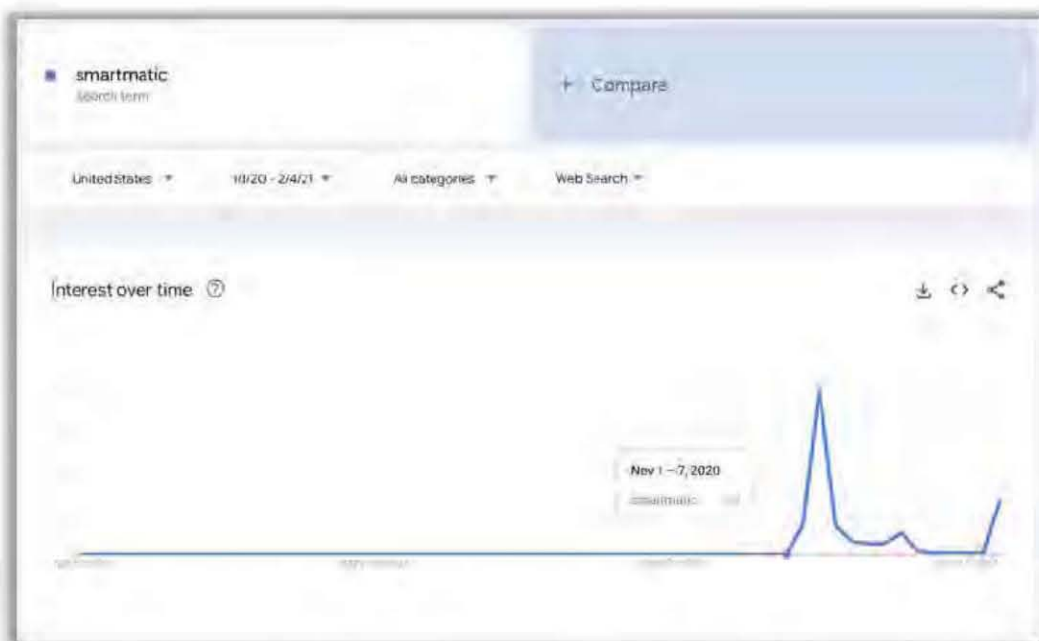
31.   Thus Google Trends is showing us that there was relatively little interest in Smartmatic among Google searchers throughout most of 2020, but interest picked up in the week after the election, and the week after that peaked, with interest 100 times the earlier, "baseline" interest.

32.   Let's now consider actual commentary, Web pages and social-media posts that mention Smartmatic. As can be seen in the following chart, the level of commentary, by one

measure, grew around 2,400-fold between the beginning of November, 2020 and November 15. (This is specifically a measure of commentary related to *Smartmatic*; it does not include more general comments regarding allegations of voter fraud that do not contain the word *Smartmatic*.)

33.   The chart below is from a Web-content-analysis tool known as *Infegy*, a system that crawls and indexes millions of pages and posts from the Web every day (discussed in more detail later). The chart shows that Infegy found a low of 40 posts containing the word *Smartmatic* on November 1, and a high of 95,644 on the 15th. (Most of the posts measured are Twitter tweets. Note that the *Change* value of 2,224% shown on the chart represents the percentage increase in posts from the first half of the chart to the second half.)

34.   This chart also shows that the volume of posts started to rise significantly on November 7. There seems to have been a groundswell of negative commentary regarding Smartmatic welling up; Infegy found just 973 posts on the 6th, but 4,306 on the 7th. The number continued at about that level for several days, but then increased to 5,798 on the 11th, 11,313 on the 12th, and so on, reaching 19,644 posts on the 15th of November. (That the commentary was predominantly related to allegations of wrongdoing by Smartmatic can be seen by a review of a sample of these messages, as I will show later in this report.)

Hovered	Lowest	Average	Highest	Change
4,306	40	13,233	95,644	2242%
Overall Total 198,501	Nov 1st, 2020		Nov 15th, 2020	

35.   It's hard to point to any single event that triggered the initial increase on the 7th of November. There was already a low volume of "derogatory" posts about Smartmatic prior to the rise, as President Trump and those around him began to talk in a general way about what they claimed was a stolen election, and about the role of electronic voting machines, attention would naturally shine on Smartmatic, one of a mere handful of companies providing electronic-voting devices in the United States.

36.   Sidney Powell and Rudy Giuliani were, during this period, actively spreading claims of voter fraud against various entities, through platforms with very broad reach; for instance, on November 8 Sidney Powell appeared on Fox News' *Sunday Morning Futures*, in which she accused the Democratic party of carrying out massive voter fraud.[6]

37.   By at least as early as November 12, Giuliani was naming Smartmatic as one of the voting-machine firms that he believed were involved in vote manipulation: "Dominion is a company" he claimed on Fox News' *Lou Dobbs Tonight,* "that's owned by another company called Smartmatic through an intermediary company named Indra… Smartmatic is a company that was formed… in order to fix elections."[7] Two days later, back on *Lou Dobbs Tonight*, Mr. Giuliani made the same assertions about Smartmatic.[8]

38.   On November 14 he tweeted that Dominion was just a "front for SMARTMATIC, who was really doing the counting" in "Michigan, Arizona and Georgia and other states." That tweet was retweeted, 26,000 times, liked 66,100 times, commented on 8,437 times, and bookmarked 589 times. Thus more than 66,100 people would have seen this tweet,[9] with yet more seeing the retweets. (Rudy Giuliani's Twitter account currently has 1,704,794 followers).

---

[6] https://www.foxnews.com/video/6208201476001
[7] In an interview on Fox News' *Lou Dobbs Tonight*, November 12, 2021; Smartmatic USA v. Sidney Powell, Complaint and Demand for a Jury trial, ¶79
[8] *Id.,* ¶140

[9] https://twitter.com/RudyGiuliani/status/1327616396939948032

39.   Sidney Powell was also busily promoting the story, and by at least as early as November 14 Sidney Powell was directly mentioning Smartmatic. That day she appeared on Fox News' *Justice with Judge Jeanine,* and during that interview she claimed Smartmatic was involved in "the alteration and changes of millions of votes."[10]

40.   The next day, Sidney Powell went on Fox News' *Sunday Morning Futures,* naming Smartmatic as being involved in election fraud, stating that the Smartmatic software was designed to rig elections, and had done so in the US Presidential Election; that it was involved in "massive election fraud."[11]

41.   Plaintiffs' own complaints list 203 different "defamatory" statements regarding Smartmatic between November 10, 2020 and December 28, 2020, on Fox News (both broadcast and Web site), OANN, Steve Bannon's War Room, NewsMax, Breitbart.com, numerous high-followership Twitter accounts, on the very popular Gateway Pundit Web site (discussed in detail later), during a Trump Campaign News Conference on CSPAN, on "Rudy Giuliani's Common

---

[10] https://www.foxnews.com/transcript/the-media-does-not-call-an-election, https://www.foxnews.com/transcript/why-doesnt-biden-camp-want-to-know-truth-about-voting-irregularities
[11] https://www.youtube.com/watch?v=iIN115MPhuY

Smartmatic v. Mike Lindell & My Pillow – Expert Report of Peter Kent

Sense" podcast, and so on.[12] Although the complaints cite to 203 different statements, these statements were often disseminated through multiple channels; for instance, through broadcast TV, streaming video on the Web, with links to the content on Twitter and other social networks, and so on.

42.   For example, on November 12, after Rudy Giuliani was interviewed by Lou Dobbs on Fox News, Mr. Dobbs sent out a tweet[13] to his massive followership (he currently has 2,434,751 followers[14]), embedding video from the show in the tweet. Thus the comments made regarding Smartmatic were heard initially by viewers of Lou Dobbs' show; but thousands more would have seen the tweet (almost 30,000 liked the tweet), and still thousands more would have seen retweets (the tweet was retweeted almost 13,000 times).

43.   Thus these 203 statements represent hundreds more opportunities for the public to hear them, with the statements being presented to thousands of people each time. Combined, the TV broadcasts alone were likely seen by millions of people. (I do not currently have viewership data. Should I receive this data—which has been requested—I reserve the right to update my opinions.)

44.   For instance, the dozens of tweets cited by Plaintiffs were distributed predominantly through multi-million-follower Twitter accounts; combined, the accounts have almost 19 *million* followers:

- @LouDobbs – 2,434,520
- @antelechia – 1,040
- @RudyGiuliani – 1,703,941
- @JudgeJeanine – 3,330,490
- @MariaBartiromo – 1,257,997
- @IngrahamAngle – 4,661,888
- @NEWSMAX – 2,494,500

---

[12] Complaints in Smartmatic v. Sidney Powell; Smartmatic v. Fox Corporation et al; Smartmatic v. Herring Networks d/b/a/ One America Network
[13] https://twitter.com/LouDobbs/status/1327024215887851521
[14] https://twitter.com/LouDobbs

- @OANN – 2,046,665
- @SidneyPowell1 – 950,068

45.   Thus each of those dozens of tweets might have been seen by thousands, even tens of thousands of people.

B.   Example: The Gateway Pundit

46.   As I show later in this report, the allegations about Smartmatic before February 5, 2021 were being broadly disseminated, to millions of Americans. They were being spread by a wide range of people in a wide range of different locations; through social media channels, through blogs, through news sites, and so on.

47.   Consider, for instance, *The Gateway Pundit*, a well-known and popular conservative blog or news site, that gets around 17.3 million visits each month,[15] and has almost 40 *million* links pointing to it from over 17,000 other Web sites.[16] The Gateway Pundit had at least 39 articles that mentioned Smartmatic posted to its site *before* February 5, 2021, starting as early as November 2016:

> 2016-11-22: https://www.thegatewaypundit.com/2016/10/wikileaks-soros-linked-voting-machines-now-used-16-states-rigged-2004-venezuela-elections/
>
> 2018-02-14: https://www.thegatewaypundit.com/2018/02/democrats-announce-plan-protect-us-elections-not-include-voter-id-includes-move-soros-linked-voting-machines/
>
> 2020-11-11: https://www.thegatewaypundit.com/2020/11/bill-barr-going/
>
> 2020-11-14: https://www.thegatewaypundit.com/2020/11/scytl-company-website-crashes-company-reportedly-released-statement-refuting-reports-us-raid-germany/
>
> 2020-11-15: https://www.thegatewaypundit.com/2020/11/sidney-powell-smartmatic-voting-machines-chairman-board-peter-neffenger-named-joe-bidens-transition-team/

---

[15] https://www.similarweb.com/website/thegatewaypundit.com/#ranking; as this page shows, TheGatewayPundit.com provides Google Analytics data to Similarweb, so this data is not merely an estimate, but based on actual Web metrics. See https://support.similarweb.com/hc/en-us/articles/208420125-Connecting-Google-Analytics-and-Similarweb and https://www.thegatewaypundit.com/2021/02/thank-gateway-pundit-listed-one-fastest-growing-us-websites-check-list/.
[16] https://majestic.com/reports/site-explorer?oq=&IndexDataSource=&q=thegatewaypundit.com

2020-11-15: https://www.thegatewaypundit.com/2020/11/wikileaks-soros-linked-voting-machines-now-used-battleground-states-used-rig-2004-venezuela-elections/

2020-11-15: https://www.thegatewaypundit.com/2020/11/fixin-overturn-results-election-multiple-states-sidney-powell-releases-kraken/

2020-11-16: https://www.thegatewaypundit.com/2020/11/sidney-powell-drops-bomb-mark-levin-show-witness-creation-smartmatic-system-used-change-election-results-video/

2020-11-17: https://www.thegatewaypundit.com/2020/11/smartmatic-director-admitted-2017-system-able-create-least-one-million-phantom-votes-years-venezuela-election/

2020-11-18: https://www.thegatewaypundit.com/2020/11/rudy-giuliani-says-votes-sent-country-counted-company-venezuela-video/

2020-11-18: https://www.thegatewaypundit.com/2020/11/welcome-america-venezuela-election-experience/

2020-11-18: https://www.thegatewaypundit.com/2020/11/dominion-voting-machines-include-weighted-race-feature-whose-purpose-cheat-elections-contacted-dominion-not-get-response/

2020-11-19: https://www.thegatewaypundit.com/2020/11/sidney-powell-calls-dominion-voting-systems-employees-step-forward-speak-fraud-video/

2020-11-19: https://www.thegatewaypundit.com/2020/11/boom-sidney-powell-drops-moab-algorighm-plugged-steal-votes-president-trump-election-video/

2020-11-19: https://www.thegatewaypundit.com/2020/11/scads-evidence-frankly-international-criminal-conspiracy-wow-attorney-sidney-powell-confiscated-servers-germany-video/

2020-11-19: https://www.thegatewaypundit.com/2020/11/huge-attorney-sidney-powell-coinfirms-alleged-dominion-servers-germany-confiscated-video/

2020-11-20: https://www.thegatewaypundit.com/2020/11/smartmatic-denies-transfer-technology-dominion-voting-systems-articles-scrubbed-website-internet-archive-never-lies/

2020-11-20: https://www.thegatewaypundit.com/2020/11/exclusive-dominion-voting-machines-dont-even-provide-candidate-vote-totals-percents-going/

2020-11-21: https://www.thegatewaypundit.com/2020/11/texas-county-goes-blue-first-time-since-1964-hiring-former-executive-smartmatic-elections-administrator/

2020-11-22: https://www.thegatewaypundit.com/2020/11/smartmatic-lied-lord-mark-malloch-brown-admitted-license-agreement-smartmatic-dominion-2015-interview-video/

2020-11-22: https://www.thegatewaypundit.com/2020/11/flashback-lou-dobbs-cnn-2006-smartmatic-based-venezuela-sold-sequoia-top-officials-still-venezuela-sale-dominion/

2020-11-22: https://www.thegatewaypundit.com/2020/11/flashback-msnbc-2019-reports-easy-hack-dominion-software-ess-voting-machines-video/

2020-11-22: https://www.thegatewaypundit.com/2020/11/got-newsmax-reporter-emerald-robinson-national-security-source-confirms-piece-hardware-secured-germany/

2020-11-22: https://www.thegatewaypundit.com/2020/11/dominion-voting-systems-connecting-dots/

2020-11-22: https://www.thegatewaypundit.com/2020/11/boom-attorney-sidney-powell-confirms-hearing-forces-confiscated-scytl-servers-germany-audio/

2020-11-27: https://www.thegatewaypundit.com/2020/11/blast-past-smartmatic-ceo-introduces-creepy-bill-gates-global-citizen-conference-june-2015/

2020-11-28: https://www.thegatewaypundit.com/2020/11/former-filipino-lawmaker-attorney-says-smartmatic-pre-loaded-machines-ballots-start-manila-elections-video/

2020-11-30: https://www.thegatewaypundit.com/2020/11/arizona-voter-fraud-witness-army-col-phil-waldron-confirms-dominion-communicating-frankfurt-election-day-video/

2020-12-03: https://www.thegatewaypundit.com/2020/12/exclusive-read-explosive-report-dominion-voting-systems-given-legislators/

2020-12-05: https://www.thegatewaypundit.com/2020/12/george-soros-appoints-lord-mark-malloch-brown-former-president-smartmatic-lead-open-society-foundation/

2020-12-06: https://www.thegatewaypundit.com/2020/12/americas-future-marxist-tyrant-maduro-looks-capture-national-assembly-will-complete-stranglehold-venezuelan-people-since-rigged-smartmatic-election-chavez-back-2004/

2020-12-11: https://www.thegatewaypundit.com/2020/12/sidney-powell-dominion-smartmatic-china-involved-cyber-pearl-harbor-2020-us-election/

2020-12-15: https://www.thegatewaypundit.com/2020/12/sidney-powell-working-rico-case-dominion-smartmatic-will-stop/

2020-12-16: https://www.thegatewaypundit.com/2020/12/exclusive-michigan-witness-carone-dominion-ceo-john-poulos-lied-michigan-senate-proof/

2020-12-17: https://www.thegatewaypundit.com/2020/12/scared-dominion-whistleblower-says-ceo-lied-michigan-testimony-personally-witnessed-internet-connections-machines/

2020-12-20: https://www.thegatewaypundit.com/2020/12/update-lies-top-lies-simple-math-proves-numbers-dont-add-media-biden-now-claim-73-turnout-time-high-since-1900/

2020-12-22: https://www.thegatewaypundit.com/2020/12/democrats-stimulus-bill-also-sends-millions-communist-maduro-regime-venezuela-dominion-voting-machines-originated/

2020-12-26: https://www.thegatewaypundit.com/2020/12/dominion-voting-machines-related-smartmatic-sequoia-functionality-switch-votes-candidates/

2021-01-08: https://www.thegatewaypundit.com/2021/01/dominion-files-1-3-billion-defamation-lawsuit-sidney-powell-considering-suing-president-trump/

48.   As can be seen, 17 of these articles were posted in November and December of 2020, starting on November 11—eight days after the election—with an article alleging that "there was an organized conspiracy to interfere in the Presidential election and thwart the will of the voters" in which Smartmatic took part (emphasis added):

> "…the voting machines were controlled by entities closely tied to Democrats and the far left: Lord Mark Malloch Brown, a **George Soros** lieutenant, whose company **Smartmatic, is intimately tied to Dominion Voting Systems who flipped votes from Trump to Biden**. His machine was used in all the swing states. This would explain the MICHIGAN 200,000 vote sudden dump of Biden ballots, while WISCONSIN got a 100,000 Biden vote dump late night delivery."[17]

49.   Indeed, as two of The Gateway Pundit links above show, Smartmatic had been linked to George Soros in 2016 and again in 2018.

50.   This was followed by articles claiming that a company in Spain that "hosted elections data improperly" had been raided by the US Army and had servers taken, with the company, Scytl, stating that "We are not tied to Smartmatic…"[18]; that reported Sydney Powell claiming that Smartmatic had been used to "steal" an election in Venezuela[19] and that a Smartmatic director had "admitted that the Smartmatic machines and software created at least one million phantom votes in the national elections in Venezuela"[20]; linking Smartmatic to "billionaire far left funder George Soros,"[21] and so on.

---

[17] https://www.thegatewaypundit.com/2020/11/bill-barr-going/
[18] https://www.thegatewaypundit.com/2020/11/scytl-company-website-crashes-company-reportedly-released-statement-refuting-reports-us-raid-germany/
[19] https://www.thegatewaypundit.com/2020/11/sidney-powell-drops-bomb-mark-levin-show-witness-creation-smartmatic-system-used-change-election-results-video/
[20] https://www.thegatewaypundit.com/2020/11/smartmatic-director-admitted-2017-system-able-create-least-one-million-phantom-votes-years-venezuela-election/
[21] https://www.thegatewaypundit.com/2020/12/george-soros-appoints-lord-mark-malloch-brown-former-president-smartmatic-lead-open-society-foundation/

51.   Gateway Pundit articles have a wide reach. The Gateway Pundit has a Twitter account with, currently, 620,855 followers.[22] That is, almost 621,000 Twitter uses have chosen to follow The Gateway Pundit account, and thousands will see any particular post from that account. For example, on November 16, 2020, Sidney Powell appeared on the Mark Levin show,[23] claiming to have a witness who could testify that the Smartmatic system was "specifically built for doing this very thing, for changing the results of elections." The Gateway Pundit reported on this interview.[24] Then The Gateway Pundit Twitter account tweeted a link to the report.[25]

52.   This tweet was retweeted 4,740 times; commented on 230 times; liked 10,500 times; and bookmarked 150 times. We have no metrics showing how often a link to the tweet

---

[22] https://twitter.com/gatewaypundit
[23] https://www.marklevinshow.com/2020/11/16/november-16-2020/
[24] https://www.thegatewaypundit.com/2020/11/sidney-powell-drops-bomb-mark-levin-show-witness-creation-smartmatic-system-used-change-election-results-video/
[25] https://twitter.com/gatewaypundit/status/1328511646663380993

was copied and sent to other people; nor do we know how many people *viewed* the post. Twitter did not, back in the relevant period report on *views* (though it does today). This is a feature that Twitter added recently, and thus tweet views are not available for tweets posted during the time at issue in this report.[26] A view metric from a recent tweet can be seen in the image below:

53.   However, if we look at recent tweets in The Gateway Pundit account, we can get an idea of how many people may see each. I summed the view metrics from ten tweets posted on September 14, 2023 (5 days prior to the date on which I collected this information),[27] each ranging from 7,775 to 12,200 views per tweet, arriving at a total of 98,366 views, or an average of 9,840 per tweet.[28]

54.   Clearly more than that saw the example I provided earlier, as 10,500 people liked the tweet. However, if we take 9,840 as the average number of views for a Gateway Pundit post, and if they tweeted links to all of the 39 posts listed above, that would suggest that more than 380,000 people saw the tweets.[29]

55.   Consider the Gateway Pundit article of November 16 that I discussed above. We know at least 10,500 people saw the tweet linking to the article, because that many liked the tweet. We also know what 4,740 people also retweeted the tweet, thus spreading the tweet to

---

[26] Tweet-view reporting was added to Twitter in December 2022. https://www.gadgets360.com/apps/news/twitter-view-count-feature-tweets-rolling-out-elon-musk-3632465
[27] https://twitter.com/search?lang=en&q=(from%3Agatewaypundit)%20until%3A2023-09-14%20since%3A2023-09-13&src=typed_query
[28] 8340+9695+12200+8505+11400+12100+11200+8363+8788+7775=98,366
[29] I have only been able to find tweets linking to 13 of the articles. (https://twitter.com/search?lang=en&q=smartmatic%20(from%3Agatewaypundit)%20until%3A2021-02-04%20since%3A2011-01-01&src=typed_query) However, note that the Twitter advanced-search feature is a little glitchy, and does not immediately function; after carrying out a search the search-results page will continue adding results over a period of minutes or even hours. It also appears not to always provide all the tweets matching the search query.

their followers, some of whom may have then retweeted again to *their* followers. However, we don't know how many people would have viewed those retweets. We also don't know how many people would have clicked on links in the tweets and retweets to go to the Web site and read the article. Nor do we know how many people used the Share feature to copy a link and send it to friends through another mechanism; on Facebook or in email, for instance.

56.   However, we do know that overall, articles posted to TheGatewayPundit.com Web site are viewed by many people. These readers come from a variety of sources; they come from search engines (as noted earlier, Similarweb reports around 17.3 million visits to this site each month[30]); from the almost 40 *million* links pointing to the Web site,[31] including links in social-media posts such as in Twitter, Facebook, Reddit, and others, and from links from other conservative blogs; and of course many regular readers arrive at the site by using a browser bookmark or by typing *thegatewaypundit.com* into a browser.

57.   I have been provided with metrics—from the Google Analytics analysis tool—showing how many pageviews were received by each of the 39 Gateway Pundit pages listed above, from their publication until February 5, 2020:[32]

	Sessions	Users
2016-11-22: wikileaks-soros-linked-voting-machines-now-used-16-states-rigged-2004-venezuela-elections/	43,730	35,389
2018-02-14: democrats-announce-plan-protect-us-elections-not-include-voter-id-includes-move-soros-linked-voting-machines/	3,069	2,328
2020-11-11: bill-barr-going/	52,366	29,032
2020-11-14: scytl-company-website-crashes-company-reportedly-released-statement-refuting-reports-us-raid-germany/	49,646	28,997
2020-11-15: sidney-powell-smartmatic-voting-machines-chairman-board-peter-neffenger-named-joe-bidens-transition-team/	66,907	45,414
2020-11-15: wikileaks-soros-linked-voting-machines-now-used-battleground-states-used-rig-2004-venezuela-elections/	32,299	19,815
2020-11-15: fixin-overturn-results-election-multiple-states-sidney-powell-releases-kraken/	124,303	66,892

---

[30] https://www.similarweb.com/website/thegatewaypundit.com/#ranking
[31] https://majestic.com/reports/site-explorer?oq=&IndexDataSource=&q=thegatewaypundit.com
[32] See Exhibit B under *Google Analytics Metrics*

2020-11-16: sidney-powell-drops-bomb-mark-levin-show-witness-creation-smartmatic-system-used-change-election-results-video/	211,083	137,214
2020-11-17: smartmatic-director-admitted-2017-system-able-create-least-one-million-phantom-votes-years-venezuela-election/	23,449	14,683
2020-11-18: rudy-giuliani-says-votes-sent-country-counted-company-venezuela-video/	19,501	9,575
2020-11-18: welcome-america-venezuela-election-experience/	5,720	3,061
2020-11-18: dominion-voting-machines-include-weighted-race-feature-whose-purpose-cheat-elections-contacted-dominion-not-get-response/	29,040	17,786
2020-11-19: sidney-powell-calls-dominion-voting-systems-employees-step-forward-speak-fraud-video/	12,418	6,857
2020-11-19: boom-sidney-powell-drops-moab-algorighm-plugged-steal-votes-president-trump-election-video/	60,524	35,817
2020-11-19: scads-evidence-frankly-international-criminal-conspiracy-wow-attorney-sidney-powell-confiscated-servers-germany-video/	49,052	27,890
2020-11-19: huge-attorney-sidney-powell-coinfirms-alleged-dominion-servers-germany-confiscated-video/	173,956	98,738
2020-11-20: smartmatic-denies-transfer-technology-dominion-voting-systems-articles-scrubbed-website-internet-archive-never-lies/	31,606	19,377
2020-11-20: exclusive-dominion-voting-machines-dont-even-provide-candidate-vote-totals-percents-going/	25,231	14,368
2020-11-21: texas-county-goes-blue-first-time-since-1964-hiring-former-executive-smartmatic-elections-administrator/	175,344	117,233
2020-11-22: smartmatic-lied-lord-mark-malloch-brown-admitted-license-agreement-smartmatic-dominion-2015-interview-video/	36,317	22,981
2020-11-22: flashback-lou-dobbs-cnn-2006-smartmatic-based-venezuela-sold-sequoia-top-officials-still-venezuela-sale-dominion/	19,260	11,259
2020-11-22: flashback-msnbc-2019-reports-easy-hack-dominion-software-ess-voting-machines-video/	9,358	5,461
2020-11-22: got-newsmax-reporter-emerald-robinson-national-security-source-confirms-piece-hardware-secured-germany/	60,608	35,424
2020-11-22: dominion-voting-systems-connecting-dots/	26,487	14,790
2020-11-22: boom-attorney-sidney-powell-confirms-hearing-forces-confiscated-scytl-servers-germany-audio/	101,399	60,257
2020-11-27: blast-past-smartmatic-ceo-introduces-creepy-bill-gates-global-citizen-conference-june-2015/	16,696	9,377
2020-11-28: former-filipino-lawmaker-attorney-says-smartmatic-pre-loaded-machines-ballots-start-manila-elections-video/	32,967	24,235
2020-11-30: arizona-voter-fraud-witness-army-col-phil-waldron-confirms-dominion-communicating-frankfurt-election-day-video/	52,248	31,768
2020-12-03: exclusive-read-explosive-report-dominion-voting-systems-given-legislators/	30,435	15,916

2020-12-05: george-soros-appoints-lord-mark-malloch-brown-former-president-smartmatic-lead-open-society-foundation/	46,033	28,866
2020-12-06: americas-future-marxist-tyrant-maduro-looks-capture-national-assembly-will-complete-stranglehold-venezuelan-people-since-rigged-smartmatic-election-chavez-back-2004/	2,590	1,273
2020-12-11: sidney-powell-dominion-smartmatic-china-involved-cyber-pearl-harbor-2020-us-election/	44,616	25,468
2020-12-15: sidney-powell-working-rico-case-dominion-smartmatic-will-stop/	45,147	27,207
2020-12-16: exclusive-michigan-witness-carone-dominion-ceo-john-poulos-lied-michigan-senate-proof/	77,484	48,883
2020-12-17: scared-dominion-whistleblower-says-ceo-lied-michigan-testimony-personally-witnessed-internet-connections-machines/	63,409	37,743
2020-12-20: update-lies-top-lies-simple-math-proves-numbers-dont-add-media-biden-now-claim-73-turnout-time-high-since-1900/	28,995	15,003
2020-12-22: democrats-stimulus-bill-also-sends-millions-communist-maduro-regime-venezuela-dominion-voting-machines-originated/	22,019	14,003
2020-12-26: dominion-voting-machines-related-smartmatic-sequoia-functionality-switch-votes-candidates/	27,961	13,938
2021-01-08: dominion-files-1-3-billion-defamation-lawsuit-sidney-powell-considering-suing-president-trump/	17,003	9,885
	1,950,276	1,184,203

58.   Thus, the Google Analytics metrics show that the pages had been viewed almost two million times, by almost 1.2 million people, before Mr. Lindell made his first comment about Smartmatic. This isn't the full impact of these articles, as information on the Internet spreads "virally." The 1.2 million people reading these articles talk about them with their friends, tweet about them, post in Facebook about them, and so on.

59.   TheGatewayPundit.com is a very popular Web site, but it's just one example out of many prominent Internet outlets (and far from the largest) that cast doubt on the results of the 2020 presidential election. Others include:

- **The Epoch Times**: Estimated 26M monthly visitors.[33] See, for instance: https://www.theepochtimes.com/search?q=smartmatic
- **Breitbart**: Estimated 36M monthly visitors.[34] See, for instance: https://www.breitbart.com/search/?s=smartmatic#gsc.tab=0&gsc.q=smartmatic&gsc.s

---

[33] https://www.similarweb.com/website/theepochtimes.com/#overview
[34] https://www.similarweb.com/website/breitbart.com/#overview

      ort=date&gsc.page=3

- **Newsmax**: Estimated 27M monthly visitors.[35] Cited by Plaintiff as disseminating defamation.
- **One America News Network**: Estimated 3.3M monthly visitors.[36] Cited by Plaintiff as disseminating defamation.
- **Fox News**: Estimated 290M monthly visitors.[37] Cited by Plaintiff as disseminating defamation.

60.   The visitor numbers above are estimates of visitors to these organizations' Web sites; they don't include the number of people seeing tweets from these organizations, or retweets of their tweets; the number seeing broadcasts from these organizations; the numbers seeing videos on their YouTube channels, and so on.

C.   Searching the Web for Smartmatic

61.   It would be impractical for me to analyze all these sources individually, so I looked at the spread of Smartmatic-related commentary prior to February 4, 2021 using another methodology; by employing Web-research tools designed to analyze the reach of ideas and statements across the Web. I employed two different Web-research tools to get an idea of the reach of the primarily commentary related to Smartmatic prior to February 4, 2021, *BuzzSumo* and *Infegy Atlas*.

62.   These tools demonstrate that discussions of Smartmatic spread far and wide prior to February 5, 2021. However, before explaining I should note that all such tools have inherent weaknesses. The Web is a vast space; Google, for instance, reports that it has "hundreds of billions of webpages and other content stored in our Search index…more information than all of the libraries of the world…[the index] is well over 100,000,000 gigabytes in size."[38] But this is a subset of all the content; Google also acknowledges that it doesn't index everything.[39]

---

[35] https://www.similarweb.com/website/newsmax.com/#overview
[36] https://www.similarweb.com/website/oann.com/#overview
[37] https://www.similarweb.com/website/foxnews.com/#overview
[38] https://www.google.com/search/howsearchworks/how-search-works/organizing-information
[39] https://developers.google.com/search/docs/fundamentals/how-search-works

63.   Thus tools such as the ones I employed have to make choices about what types of information they will download and index, and how much. In some cases the information may actually be unavailable. Facebook pages, for instance, are often inaccessible, because people can limit viewers of their posts to just their friends, thus blocking these tools from accessing the information. But in addition, because of the scale of the Web, the designers of these tools have to decide what *kind* of data they will focus on. They can't index the entire Web, and so choices must be made. BuzzSumo, for instance, searches for articles on blogs and news sites, then looks in a limited number of social-media sites and counts links it finds to those pages; it doesn't actually index the posts, though. Infegy, on the other hand, indexes much more, including indexing posts from important social-media sites.

64.   Thus the data I present below gives an idea of the huge scale of the dissemination of information regarding Smartmatic, but it should not be regarded as comprehensive; there is much that these tools could not have uncovered.

1.   BuzzSumo

65.   I used *BuzzSumo* to search for articles posted online that mention *Smartmatic*, during the time period noted earlier; from January 1, 2020, until February 4, 2021. BuzzSumo is a service that many corporations use to analyze online content for various purposes: competitor intelligence, PR, crisis alerts, content-marketing research, and so on.[40] The tool is designed to provide an understanding of how popular articles of a particular theme have been on social media. That is, the tool finds articles for the searcher, then analyzes how many people have linked to those articles from Facebook, Twitter, Pinterest, and Reddit, and how many have created links from other Web pages outside those social networks.

66.   Over the last five years the company has collected information about 8 billion Web pages, 300 trillion social engagements with those pages, 3 million social influencers, and so

---

[40] www.BuzzSumo.com

on; it indexes five million pages a day.[41] The tool is used by "thousands of marketers every day" including staff from Expedia, Hubspot, BuzzFeed, Ogilvy, and The London Telegraph.[42]

67.   The following chart shows a BuzzSumo report of articles that mention Smartmatic published, week-by-week, from the beginning of January 2020 until February 4th, 2021 (the day before the first allegedly defamatory remarks by Mr. Lindell according to Plaintiffs).[43] These articles are from a wide range of Web sites, from well-known news sites such as BusinessWire.com, CNN.com, FoxNews.com, and WashingtonPost.com, to relatively little-known news sites and blogs such as TheTruthIsTheLight.home.com, ConservativeFighters.org, and ConservativePapers.com. It also includes around 400 video pages on YouTube.com and Vimeo.com (BuzzSumo indexes the text content on these pages, not the speech in the videos).

68.   As can be seen, BuzzSumo collected information regarding 1,589 articles during this period, and measured a total of 2,639,807 "engagements," including around 14,000 links from 3,483 different Web sites pointing to these articles.

---

69.   Until November 2020, Smartmatic mentions found by BuzzSumo were low: typically 0 to 3 articles a week, with a few small peaks: 7 in the week beginning February 2, 2020 and 10 in the week beginning July 12, 2020, for instance.

70.   It was in the week beginning on November 8, 2020 that the volume dramatically increased, as shown in the table below, following a similar growth to that we saw earlier based on Infegy data:

Week Commencing	Number of Articles
Nov 1, 2020	7
Nov 8	50
Nov 15	390
Nov 22	292
Nov 29	155
Dec 6	106
Dec 13	120
Dec 20	145
Dec 27	16
Jan 3, 2021	15
Jan 10	17
Jan 17	8
Jan 24	6
Feb 1 – 4	179

71.   Volume drops off late in December, but then there's a sudden rise again at the beginning of the first week in February 2021, just before the first alleged defamatory statements were issued by Mike Lindell; the 179 were posted before Mr. Lindell's documentary was released.

72.   This uptick in the first four days of February was due to reporting regarding the lawsuit filed by Smartmatic against Fox News cable network and Rudolph Giuliani, filed on February 3, 2021. All of the 166 posts reported by BuzzSumo on February 3 and February 4, are related to this issue.[44]

---

[44] *BuzzSumo Smartmatic Articles.xlsx*

Smartmatic v. Mike Lindell & My Pillow – Expert Report of Peter Kent   29

KENT-0029

Social Media Engagement

73.   BuzzSumo also examines several social-media channels—Facebook, Pinterest, Twitter, and Reddit—to search for links pointing to the indexed content. Consider, for instance, the post titled *Sidney Powell Files Lawsuits Challenging Election Results in Georgia, Michigan* at https://www.breitbart.com/politics/2020/11/26/sidney-powell-files-lawsuits-challenging-election-results-in-georgia-michigan/.

74.   BuzzSumo indexed this article, and then looked for posts in social media that linked to the article. As shown in the table below,[45] BuzzSumo found 123,400 Facebook engagements with the article, 901 Twitter shares, 3 Pinterest engagements, 3 Reddit engagements, and 41 links from other Web sites pointing to this article.

75.   BuzzSumo defines a Facebook Engagement as somebody sharing a link to the article, and then other people liking the post, commenting on that post, or sharing the post.[46]

---

[45] See also the data file *articles_smartmatic_2023-09-12_1694536615.xlsx*

[46] https://help.buzzsumo.com/en/articles/1964658-what-is-a-facebook-engagement

76.   As for Twitter, the measured engagements (although described as *shares*) are tweets and retweets[47]; for Pinterest they are "pins"[48]; and for Reddit they are upvotes and comments.[49]

77.   BuzzSumo also looks for links pointing to the referenced article from other Web sites.[50] In this case, for instance, BuzzSumo found 41 Web sites—not including these four social networks—linking to the article.

Limitations in the BuzzSumo Analysis

78.   There are, of course, limitations in the BuzzSumo analysis, as there are with any such tool. Consider, for instance, the 2,639,807 "engagements" with the 1,589 articles it found. It should not be assumed that this is the maximum number of engagements with these articles, and by no means the total *reach* of the articles, by any means.

79.   **Article Readership**: We have no information about how many people *read* these 1,589 articles; this is information to which BuzzSumo does not have access. Some were potentially read thousands if not tens of thousands of times; some are from very popular Web sites, after all. Combined there could be millions of pageviews for these articles. Readers would access these articles not just through the social-media platforms analyzed by BuzzSumo; they would also arrive there through the major search engines (Google, Bing, and Yahoo); through the "off-social-media" links found by BuzzSumo, but also from others likely not found by BuzzSumo; and by directly accessing these Web sites. Breitbart.com is a very popular Web site, for instance, with one analysis estimating that it gets around 36 *million* visitors a month.[51]

80.   **Missing Social Media Sites**: BuzzSumo looks at a small range of social-media sites: Twitter, Facebook, Reddit, and Pinterest. There are scores more that it does not analyze.

---

[47] https://help.buzzsumo.com/en/articles/6075271-what-data-is-included-in-the-content-ideas-generator
[48] *Ibid.*
[49] https://help.buzzsumo.com/en/articles/1964659-what-is-a-reddit-engagement
[50] https://help.buzzsumo.com/en/articles/1633279-backlinks-explained
[51] https://www.similarweb.com/website/breitbart.com/#overview

81.   **Engagement Within Those Sites**: Even within the sites that BuzzSumo analyzes, it is not able to measure full engagement. For instance, consider the article we examined earlier, *Sidney Powell Files Lawsuits Challenging Election Results in Georgia, Michigan* at https://www.breitbart.com/politics/2020/11/26/sidney-powell-files-lawsuits-challenging-election-results-in-georgia-michigan/. BuzzSumo tells us that there were 123,400 Facebook engagements, meaning that 123,400 people liked, shared, or commented on posts linking to the article. It also tells us that 901 Twitter users linked to the article, or shared posts that linked to the article. But it tells us nothing about how many people *saw* these posts, or how many clicked on the links to land on the article and read it.

82.   For example, BuzzSumo provides a "Top Sharers" list, information about the Twitter accounts that shared links to the articles. For this particular article, BuzzSumo provided information regarding 796 "Top Sharers," and estimates that these accounts have a total of around 6,934,538 Twitter followers.[52] Thus while it only shows 901 Twitter "engagements," the potential viewers of these posts are in the tens of thousands. Earlier in this report I gave an example from The Gateway Pundit Twitter account, calculating an average of 9,840 views per tweet. The Gateway Pundit currently has just 620,855 followers. If we use the same metric for these Twitter accounts, the 6,934,538 followers of these Top Sharers would represent 100,000 or more views of the tweets pointing to the article.

83.   Consider the top sharer for this Breitbart.com article, Breitbart's own Twitter account, @BreitbartNews. This account has, according to BuzzSumo, 2,021,259 followers[53]; Twitter itself currently puts the number at 2,022,455. As an example, the following post was viewed 24,200 times: https://twitter.com/BreitbartNews/status/1701435520079818882. And this was viewed 23,900 times: https://twitter.com/BreitbartNews/status/1701430499342717064. These numbers are, therefore, around 1.2 percent of all followers were presented with these

---

[52] *Breitbart Sharers smartmatic.xlsx.*
[53] *Ibid.*

tweets. Should that number hold true for the 6,934,538 followers of the people sharing the link to the Breitbart article, then somewhere around 83,200 people would have seen those posts.

84.   Of course the same concept applies to the Facebook, Reddit, and Pinterest posts; we don't know how many people read the posts or clicked through to the article. Nor do we know how many people shared links through other mechanisms; through emails or text messages, for instance. Thus, the 2,639,807 "engagements" found by BuzzSumo potentially represent a "reach" in the tens of millions of people.

2.   Infegy Atlas Data

85.   I also used a system called *Infegy Atlas*[54] to look for mentions of Smartmatic in social media—Twitter, Instagram, VK, Pinterest, Tiktok, Facebook, Reddit, and Weibo—and on the Web more broadly (in blogs and forums, for instance; note, however, that most of the posts—78%—that mentioned Smartmatic and were discovered by Infegy Atlas were on Twitter.)[55] Infegy has been constantly crawling the Web, downloading and indexing content, since 2007.

86.   Again, I searched for mentions of *Smartmatic* from January 1, 2020 to February 4, 2021. I used the following Boolean syntax: *smartmatic* OR #smartmatic OR #smartmatics OR @smartmatic*; this tells Infegy to search for Web content that contains any of these words. (The term *smartmatic** means anything that begins with *smartmatic: smartmatic or smartmatics*, for instance). Infegy searched within the body, description, and title of the posts and articles, and excluded posts that used the smartmatic social-media "handle"; that is, posts that appeared to be posted by the company itself.

87.   Infegy Atlas found a total "universe" of 1.21 *million* posts,[56] with an estimated total number of impressions of 79.8 million,[57] and a total reach of 7.09 *billion*[58]:

---

[54] https://www.infegy.com/
[55] *Data Sources _ Infegy Help Center.pdf*, downloaded from https://help.infegy.com/en/articles/6496464-infegy-atlas-data-sources
[56] *Infegy Universe of Posts.xlsx*, downloaded from Infegy.
[57] *Id, Query Meta* sheet tab.
[58] *Ibid.*
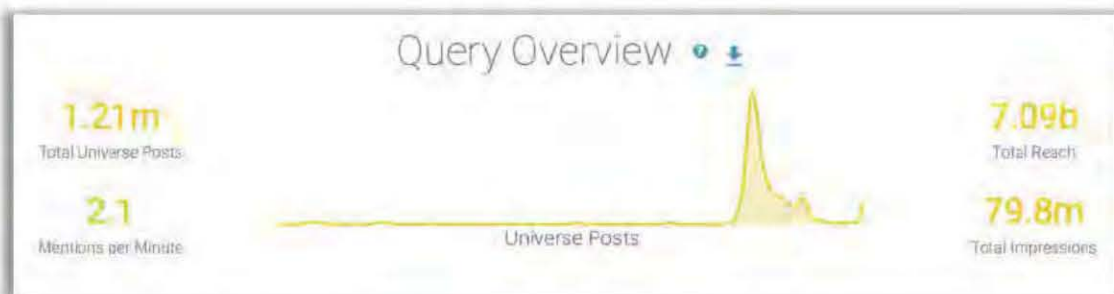
88.   The *impressions* number is "an estimate of the potential number of times a piece of content was seen or viewed,"[59] while the *reach* figure is the number who *could have* seen the posts[60]; that is, the number of followers of the posters.

89.   These numbers are estimates; Infegy has not downloaded a total of 1.21m posts, for instance (as I'll show in a moment, it actually found around 161,000). However, Infegy knows that it cannot possibly find everything on the Web, and so extrapolates and estimates what it believes is most likely present on the Web.[61]

90.   Infegy's Post Count chart shows what it actually found, the data from which it extrapolated:
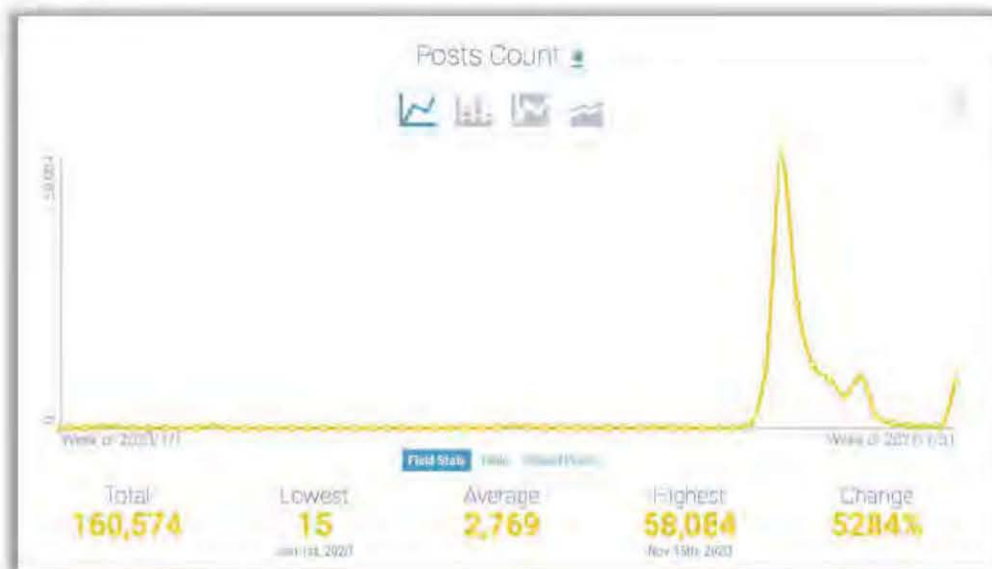
---

[59] *Impressions (Overview tab) _ Infegy Help Center.pdf*, downloaded from
https://help.infegy.com/en/articles/6122514-impressions-overview-tab
[60] *Reach Metric (Overview tab) _ Infegy Help Center.pdf*, downloaded from
https://help.infegy.com/en/articles/6122501-reach-metric-overview-tab
[61] *Volume Metrics _ Infegy Help Center.pdf*, downloaded from https://help.infegy.com/en/articles/6122714-volume-metrics

91.   In this case we can see that Infegy is basing its calculations on the discovery of 160,574 posts discussing Smartmatic during this time period.[62] The lowest count was during the week beginning January 1st, 2020, with just 15 posts; but Infegy found 58,084 items posted during the week beginning on November 15th, more than 4,000 times as many.[63]

92.   This is a measure of the number of posts found by Infegy Atlas that contain the word *smartmatic*. But the system also measures *engagements* with those posts; the number of people sharing, commenting, liking, and so on.[64]

93.   Again, Infegy Atlas provides extrapolated "universe" data, as shown below:
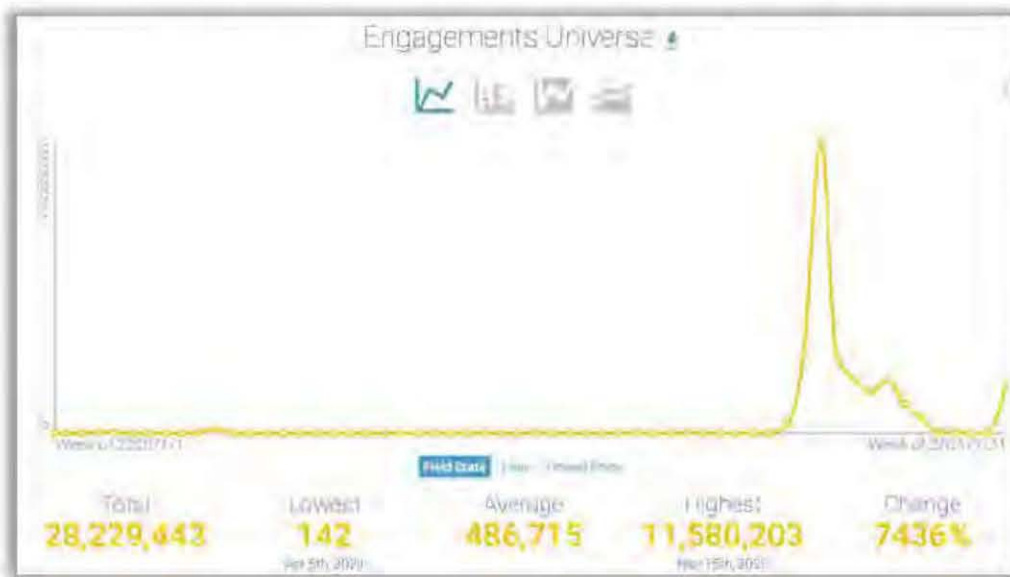
94.   The system estimates that there were likely 28,229,443 engagements of various kinds during this time period.[65] As for the actual measured engagements, Infegy Atlas reports 3,765,118[66]

95.   Note that most of these posts, and subsequent impressions and reach, occurred beginning with the week starting on November 8, 2020, with the peak—58,084 posts—during

---

[62] *Infegy Posts Count xlsx*, downloaded from Infegy
[63] *Ibid.*
[64] *The Infegy Glossary _ Infegy Help Center.pdf*, downloaded from https://help.infegy.com/en/articles/6126051-the-infegy-glossary
[65] *Infegy Engagement Count.xlsx*, downloaded from Infegy
[66] *Ibid.*

the following week.[67] Thus Infegy Atlas shows a similar pattern to that shown by BuzzSumo; a relatively low level of discussion regarding Smartmatic through most of 2020, following by an enormous burst of activity, beginning in the week after the 2020 election. (Also a similar pattern to the measure of interest among searchers as measured by Google Trends, discussed earlier.)

96.   Infegy Atlas counted 12,750 posts related to Smartmatic in the week after the election (the week of November 8, 2020)—with an extrapolated value of 95,708, followed by 58,084 posts the week after that (an extrapolated value of 429,290). Activity then drops off, but picks up again at the end of January, 2021 (the week of January 31), with 10,015 posts measured that week (an extrapolated value of 70,038).[68]

97.   The following chart shows that in the most active week—the week with 58,084 counted posts and 429,290 extrapolated posts—Infegy Atlas measured 1,1570,103 engagements (an extrapolated value of 11,580,212 engagements).[69] Infegy Atlas shows a total of 3,653,791 measured engagements between November 8th and February 4th inclusive (an extrapolated value of 27,328,020 engagements).

Hovered	Lowest	Average	Highest	Change
1,570,103	14	64,916	1,570,103	11082%

---

[67] *Infegy Posts Count.xlsx*
[68] *Ibid.*
[69] *Infegy Engagement Count.xlsx*, downloaded from Infegy

98.   Infegy Atlas shows the enormous distribution of messaging regarding Smartmatic prior to February 5th, 2021, as summarized below:

Metric	Collected	Extrapolated
Posts	160,574	1.21M
Impressions	[70]	79.8M
Reach		7.09B
Engagement	3,765,118	28,229,443

99.   Note that the burst of commentary after the election was predominantly related to the allegations that Smartmatic was involved in vote manipulation in the 2020 Presidential election. This can be seen by sampling the messages collected by Infegy from the sudden increase in commentary after the election. I downloaded a sample of 10,000 posts[71] from August 15, 2020. A review of the English language posts (89 percent of the posts) clearly shows that the posts are predominantly related to these allegations. For instance, the following are the first ten English language posts I extracted from the sample file; all ten clearly relate to this issue:

- RT @ReportBread: Worth Remembering: Podesta emails: Voting machine company Smartmatic's message to Soros before the 2016 election concernin…

- RT @BeholdIsrael: Connect the dots between: Dominion machines , Smartmatic software, Germany, Venezuela and the 2018 Executive Order on Im…

- RT @ProudPATRlOT: BREAKING; Sidney Powell on Maria Bartiromo: -Massive criminal election fraud with Dominion & Smartmatic. -This will o…

- RT @MajorPatriot: 💥💥💥INSANE!💥💥💥 Dominion Voting Systems subsidary, Smartmatic USA Board Chairman, is Vice Admiral Peter Neffenger (Ret).…

- RT @SidneyPowell1: Worse than that, the evidence will show that #Dominion and #Smartmatic were created for the precise evil purpose of rigg…

- RT @kylenabecker: BUSTED A SECOND TIME. 🚩🚩 Dominion, Scytl, ES&S, Smartmatic appear to be engaged in engineering election results. CNN, o…

- RT @charliekirk11: What did the chairman of Smartmatic, a vote tabulating software, do to earn a place on Joe Biden's "transition team?"

- RT @CodeMonkeyZ: "The concerns about possible ties between the owners of

---

[70] Infegy does not have access to impression or view data; as noted elsewhere in this report, for instance, Twitter did not until recently publish view data. Therefore Infegy estimates impressions and reach.

[71] *Infegy August 2019 Posts.xlsx*, downloaded from Infegy; 10,000 is the maximum export size from Infegy.

Smartmatic and the Chávez government have been well known to Unite…

- RT @MajorPatriot: ✺✺✺INSANE!✺✺✺ Dominion Voting Systems subsidiary, Smartmatic USA Board Chairman, is Vice Admiral Peter Neffenger (Ret).…

D.   Controversial Smartmatic Content Predates the 2020 Election

100.   While this case revolves around allegations that Smartmatic was involved in voter fraud during the 2020 Presidential Election, one might consider these allegations as a continuation of a much broader public debate that started years earlier, involving not just Smartmatic but all the companies that provide electronic voting machines for use in elections in the United States, also including Dominion Voting Systems Corp[72] and Election Systems and Software, LLC[73] (ES&S).

101.   Despite the huge growth in commentary regarding Smartmatic beginning the week after the 2020 Presidential Election, described earlier in this report, there had been a lower-level of commentary online regarding the company for several years. These Smartmatic-related posts were generally in one of the following groups:

- Non-controversial messaging, including posts from the company itself and news stories related to its business.

- Accusations of vote manipulation elsewhere, in particular in the Philippines and Venezuela.

- Discussions of electronic-voting-machine vulnerabilities.

102.   I used Infegy Atlas to carry out the same *smartmatic* search described earlier, but from September 22, 2018 (the earliest date provided by the tool) to October 31, 2020, immediately before the 2020 election.[74] During this period Infegy Atlas estimated that there had been 693,041 posts,[75] with 31,457,930 impressions.[76]

---

[72] https://www.dominionvoting.com/
[73] https://www.essvote.com/
[74] *Infegy Pre-Election Posts.xlsx*, downloaded from Infegy Atlas
[75] *Infegy Pre-Election Numbers.xlsx*, downloaded from Infegy Atlas
[76] *Id.* Query Meta sheet tab

103.   These estimates were based on finding 49,373 posts.[77] A sample of these posts can be seen in the 10,000-post file I exported (the maximum export limit provided by Infegy Atlas; the tool randomly picks 10,000).[78]

E.   Accusations of Fraud Prior to the 2020 Election

104.   During this period Infegy Atlas found that almost half of the 49,373 posts (24,177) occurred during August of 2019, a month during which Smartmatic was involved in an election in Argentina.[79] I exported 10,000 posts from this month,[80] and of the 6,729 posts for which Infegy Atlas was able to determine a country, it found that 5,637 (84%) were from Argentina.

---

[77] *Id.*, volume tab
[78] *Pre-Election Posts.xlsx*, downloaded from Infegy
[79] https://www.smartmatic.com/us/media/article/provisional-results-in-argentina-fast-transparent-and-trustworthy/
[80] *Infegy August 2019 Posts.xlsx*, downloaded from Infegy Atlas.

105.   There was, at the time in Argentina, accusations that the Smartmatic system could be used for electoral fraud. The *Frente de Todos* political group claimed that the Smartmatic system could be used to interfere with election data, and that "[we] fear that the government will try to interfere with the count" using the system.[81]

106.   Smartmatic has also been embroiled in controversy in the Philippines—see, for instance, *"Bayan Muna: Smartmatic should be 'banned perpetually',"* from June 1, 2019[82]—and has been accused of assisting the Venezuelan government with electoral fraud in several elections. Smartmatic itself complained that the Venezuelan government had improperly reported the turnout of the July 2017 election.[83] (Ironically, although Smartmatic claimed that their machines had counted the vote correctly, Smartmatic's own statements were, some claimed, an admission that the company had been involved in fraud.[84])

F.   Smartmatic and Hugo Chavez

107.   Smartmatic is often mentioned in connection with Hugo Chavez, President of Venezuela from 1999 to 2013, with the suggestion that the company was started at his direction, or with his assistance, or that Smartmatic assisted in ensuring he was reelected.

108.   I again searched the September 22, 2018 to October 31, 2020 date range for *smartmatic* posts, this time limiting the posts to those that included the name *chavez*.

109.   Infegy found 620 such posts, and estimated that the full number would be around 9,835.[85] It also estimated that 647,580 views of these posts would have occurred,[86] found 693 engagements with the posts, and estimated total engagement to have been around 6,172.[87]

---

[81] https://www.batimes.com.ar/news/argentina/controversy-arises-over-use-of-smartmatic-system-in-pasos.phtml
[82] https://newsinfo.inquirer.net/1125743/bayan-muna-smartmatic-should-be-banned-perpetually
[83] https://www.nytimes.com/2017/08/02/world/americas/venezuela-election-turnout.html
[84] https://www.thegatewaypundit.com/2020/11/smartmatic-director-admitted-2017-system-able-create-least-one-million-phantom-votes-years-venezuela-election/
[85] *Infegy Hugo Chavez Searches.xlsx*, downloaded from Infegy
[86] *Id.,* Query Meta sheet tab
[87] *Infegy Hugo Chavez Engagement.pdf,* downloaded from Infegy

110.   Thus there was clearly commentary regarding Smartmatic's relationship with Hugo Chavez predating the 2020 election in the US. It was at a relatively low level, but it served as "kindling" of a sort; after the 2020 election the number of Chavez-related posts exploded. I searched Infegy for this data starting the day after the 2020 election until February 4, 2021, and this time Infegy found 6,388, and calculated that there were likely around 48,556 such posts.[88] It also found 190,123 engagements with the posts, and estimated total engagement to have been around 1,403,416.[89]

G.   Smartmatic and Dominion

111.   Smartmatic is often conflated with Dominion Voting Systems; allegations are that Smartmatic owns or operates Dominion, that Dominion is merely a "front" for Smartmatic, which does the actual vote counting, and so on. I carried out a *smartmatic* search—again from September 22, 2018 to October 31, 2020, looking for posts that also contained the term *dominion*.

112.   Again, this was clearly a theme even before the 2020 election, though also at a low level. Infegy found 49 such posts, and estimated that the full number would be around 1,094.[90] It also estimated that 121,990 views of these posts would have occurred,[91] though it found no engagements with the posts. Although Infegy found a small number of such posts, a review of the texts of those posts shows that they were often directly associating the two firms, and in some cases simply grouping them together as "corrupt" in some way[92] The following is an example (emphasis added):

> @dmills3710 Scrap Corruption-ridden Electronic Voting All prominent electronic voting systems in U.S. (**Smartmatic**, Sequoia, Diebold, ES&S, **Dominion** & Hart InterCivic) **are networked to the SAME SOFTWARE ENGINE & controlled by same FINANCIERS** tied to George Soros & Queen's Privy Council

---

[88] *Infegy Hugo Chavez Searches after Election.xlsx*, downloaded from Infegy
[89] *Infegy Hugo Chavez Engagements after Election.xlsx*, downloaded from Infegy
[90] *Infegy Dominion Posts.xlsx*, downloaded from Infegy
[91] *Id.,* Query Meta sheet tab
[92] *Infegy Dominion Post Texts.xlsx*, downloaded from Infegy

Smartmatic v. Mike Lindell & My Pillow – Expert Report of Peter Kent   41
KENT-0041

H.   The Voting-Machine Debate

113.   As Plaintiffs have noted,[93] prior to the 2020 election a debate had been underway for several years in the United States related to concerns that electronic voting machines are not secure, that they are too easily hacked or manipulated.

114.   These concerns were—certainly in the past—*bipartisan,* with both Republicans and Democrats expressing concern. This debate was not focused solely on Smartmatic; it involved all and any voting-machine companies, though certainly Smartmatic was frequently named. The following are a few examples of national press discussing this issue and disseminating information about it online.

- 2006-08-24 – *CNN: Democracy for Sale: Electronic Voting Machines malfunction* https://www.youtube.com/watch?v=-s9PkuiIw2Q

- 2012-07-25 – Phys.org: *Security flaws could taint 2012 US election: report* https://phys.org/news/2012-07-flaws-taint-election.html

- 2017-08-03 – Phys.org: *Voting machines and election systems - a quick look* https://phys.org/news/2017-08-voting-machines-election-quick.html

- 2018-03-20 – Wall Street Journal: *Senate Panel Urges Election Security in Report on Russian Interference* https://www.wsj.com/articles/senate-panel-urges-election-security-in-report-on-russian-interference-1521564622

- 2018-03-21 – New York Times: *Efforts to Secure Elections Moving Too Slowly, Senators Tell Homeland Security Chief* https://www.nytimes.com/2018/03/21/us/politics/senate-intelligence-hearing-elections-security.html

- 2018-10-29 – NBC: *US Election Integrity Depends on Security-Challenged Firms* https://www.nbcbayarea.com/news/national-international/us-election-integrity-security-challenged-firms/2037082/

- 2018-12-13 – Wall Street Journal: *Election Security* https://www.wsj.com/video/events/election-security/252F9BA7-E5DB-40D9-82CC-84DB464668E3.html

- 2019-03-27 - Amy Klobuchar Web Site: *Ranking Members Klobuchar, Warner, Reed, and Peters Press Election Equipment Manufacturers on Security* https://www.klobuchar.senate.gov/public/index.cfm/2019/3/ranking-members-klobuchar-warner-reed-and-peters-press-election-equipment-manufacturers-on-security

---

[93] First Supplemental Complaint and Demand for Jury Trial, Page 82 - 83

- 2019-05-02 – National Public Radio: *Trips To Vegas And Chocolate-Covered Pretzels: Election Vendors Come Under Scrutiny* https://npr.org/2019/05/02/718270183/trips-to-vegas-and-chocolate-covered-pretzels-election-vendors-come-under-scruti

- 2019-08-09 – *MSNBC: Hackers putting new voting machines to the test* https://www.msnbc.com/velshi-ruhle/watch/hackers-putting-new-voting-machines-to-the-test-65763909893

- 2019-08-10 - CNN: *Watch this hacker break into a voting machine* https://www.cnn.com/videos/business/2019/08/10/voting-booth-hack-def-con-orig.cnn-business

- 2019-08-12 – NBC News: *How Hackers Can Target Voting Machines* https://www.youtube.com/watch?v=QtWP0KDx2hA

- 2019-12-24 - *California Secretary of State Consultant's Public Report on: Security and Telecommunications Testing of the LA County VSAP 2.0 Voting System* https://votingsystems.cdn.sos.ca.gov/vendors/LAC/vsap2-sec-tel.pdf

- 2020-01-10 – NBC News: *'Online and vulnerable': Experts find nearly three dozen U.S. voting systems connected to internet.* https://www.nbcnews.com/politics/elections/online-vulnerable-experts-find-nearly-three-dozen-u-s-voting-n1112436

- 2020-03-03 – Politico: *Los Angeles County's risky voting experiment* https://www.politico.com/news/2020/03/03/los-angeles-county-voting-experiment-119157

- 2023-09-26 – New York Times: *The Crisis of Election Security* https://www.nytimes.com/2018/09/26/magazine/election-security-crisis-midterms.html
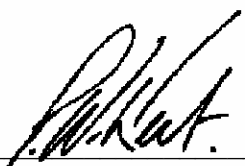
VII.   Summary of Conclusions

115.   The following is a summary of my conclusions:

- The kind of statements that Plaintiffs regard as defamatory were widely broadcast by numerous parties prior to Defendants first comments regarding Smartmatic.

- A surge of commentary regarding Smartmatic began within days of the 2020 Presidential Election.

- Google Trends shows that there was a huge growth in interest among the public, with the number of people searching for *smartmatic* growing 100-fold soon after the election.

- Two research tools I employed, BuzzSumo and Infegy, provide data showing that this growth in interest was mirrored by a growth in commentary; the number of social media posts and Web-page articles that included the word *smartmatic* grew

dramatically the week after the election.

- Prominent figures, such as Sidney Powell and Rudy Giuliani, were talking about Smartmatic frequently and to distribution channels—Fox News, Newsmax, OANN, and the like—with a very wide reach, almost three months before Defendants made any statements about the company.

- Many very popular Web sites—and even TV channels—were talking about Smartmatic, organizations such as The Gateway Pundit, Fox News, Breitbart.com, etc.

- The BuzzSumo research tool found 1,589 articles from a wide range of Web sites—including major news sites—mentioning Smartmatic posted between the election and February 4, 2020.

- BuzzSumo found 2,639,807 "engagements" with this content from social media posts.

- The Infegy Atlas research tool found more than 160,000 such posts in this period, and estimated that there were likely 1.2 *million* such posts on the Internet.

- The tool also estimated that these posts were likely seen almost 80 million times.

- Controversial commentary about Smartmatic was already present on the Web prior to the election, including allegations of vote manipulation in other elections.

- A debate had been underway in the United States since at least 2006 regarding voting-machine security, with many allegations that the various machines were not secure.

September 22, 2023   _____
                                                                        Peter Kent

Exhibit A: CV, Cases Kent Testified in the Last Four Years

Case Name:	Engaged By:	Case No.:	Court:	Year:	Testified In:
Eric Coomer, PhD. v. Michael Lindell	Defendant	1:22-cv-01129	US District Court, District of Colorado	2023	Deposition
Receiver of Today's Growth Consultant (TGC) v. Cody Neer	Defendant	Ancillary to 1:19-cv-08454	US Dist. Ct., Middle District of FL, Tampa	2023 2022	Trial Deposition
Express Mobile v. GoDaddy.com	Defendant	19-1937-RGA	US District Court For The District of Delaware	2023 2021	Trial Deposition
Tireboots by Universal Canvas v. Tiresocks	Plaintiff	20 CV 7404	US Dist. Ct., Northern Dist. of Illinois, Eastern Division	2023	Deposition
Lerner & Rowe v. Brown Engstrand	Defendant	2:21-cv-01540-DG	US District Court District of Arizona	2022	Deposition
M. Damian, Receiver of TGC v. Cody Neer	Defendant	Ancillary Case to 1:19-cv-08454	US District Court Middle District of Florida, Tampa Division	2022	Deposition
Car Registration v. Google	Defendant	01-21-0002-0578	American Arbitration Assoc.	2022	Mediation
The Cookie Department v. The Hershey Company	Defendant	3:20-cv-099324-KAW	US District Court Northern District of California	2022	Deposition
UMG Recordings v. Vital Pharmaceuticals and Jack Owoc	Defendant	0:21-cv-60914	US District Court Southern District of Florida	2022	Deposition
Bob Agahi v. Kevin Richard Kelly	Plaintiff	2:21-cv-01369-DLR	US District Court District of Arizona	2022	Deposition
PharmacyChecker.com v. National Association of Boards of Pharmacy	Defendants	7:19-cv-07577-KMK	US District Court, Southern District of New York	2022	Deposition
adidas v. Fashion Nova	Defendant	3:19-cv-00740-AC	US District Court District of Oregon, Portland Division	2022	Deposition
Drips Holdings, LLC v. Teledrip, LLC	Defendant	5:19-CV-02789	US District Court, Northern District of Ohio, Cleveland	2022	Deposition
Opal Labs, Inc. v. Sprinklr, Inc.	Plaintiff	17CV38400	US District Court, Dist. Of Oregon, Portland Div.	2021	Deposition Trial
Petruss Media Group v. Advantage Sales & Marketing	Defendant	01-19-0002-7532	American Arbitration Association	2021	Deposition
Energy Intelligence Group v. Kirby Inland Marine	Plaintiff	Civil Actions 4:19-cv-03520 4:19-cv-04121	US District Court, Southern District of Texas (Houston)	2021	Deposition
Monster Energy Company, v. Vital Pharmaceuticals & Jack Owoc	Defendant	5:18-cv-1882-JGB-SHK	US District Court, Central District of California	2021	Deposition
Resman, LLC v. Karya Property Management, CBM & IPR	Petitioner	CBM2020-00020	USPTO	2021	Deposition
FurnitureDealer.net v. Amazon.com & Coaster Company of America	Defendant (Coaster)	0:18-cv-00232-JRT-HB	U.S. District Court, Minnesota	2021	Deposition
JUUL Labs v. 4XPods, Eonsmoke	Defendant	18-15444 (KM) (MAH)	US District Court, District of New Jersey	2021	Deposition
Droplets v. Yahoo!	Defendant	12-cv-03733-JST	US District Court, N District of CA, Oakland Division	2021	Deposition
Troubleshooter Network v. HomeAdvisor, Inc., et al.	Plaintiff	018-CV-02362-WJM-STV	US District Court for the District of Colorado	2020	Deposition
Kevin Halpern & Celluride Wireless, Inc. v. Uber Technologies, et al.	Plaintiff	CGC-15-545825	Superior Court, City & County of San Francisco	2020 2019	Deposition Trial
GDM v. Astral	Defendant	4:17-CV-01069-SRB	U.S. Dist Court, West'n Dist of Missouri, Kansas City	2019	Deposition

Exhibit B: Materials Considered

- 2023.04.07 Dkt. 125 First Supplemental Complaint.pdf
- 2021 The Long Fuse_Misinformation and the 2020 Election_EIP-Final-Report.pdf
- Attachment A to Document Subpoena to Fox News.docx
- Chart of Defamatory Statements.xlsx
- Smartmatic Exhibits to the Supplemental Complaint, PDFs 1.pdf - 142.pdf
- 2023.04.07 Dkt. 125-144 Ex. 143.pdf
- 2023.04.07 Dkt. 125-145 Ex. 144.pdf
- 2023.04.07 Dkt. 125-146 Ex. 145.pdf
- Index of Exhibits .pdf
- 2023.04.07 Dkt. 125 First Supplemental Complaint.pdf
- Smartmatic v Fox News - 2021.02.04 Dkt 0001 - Summons and Complaint (v. Fox).pdf
- Smartmatic v Fox News - 2023.03.06 Dkt 1999 - First Amended Complaint (v. Fox).pdf
- Smartmatic v Herring Networks OANN - 2021.11.03 - Dkt 1 - Complaint (v. OANN).pdf
- Smartmatic v Newsmax Media - 2021.11.03 - Complaint.pdf
- Smartmatic v Powell - 2021.11.12 Dkt 001 - Complaint.pdf
- LIN_OAN_SUB.0000001-6 CONFIDENTIAL_REDACTED-better copy.pdf
- 2023-09-21 – TGP
- Wikileaks Soros Linked Voting Machines Now Used in 16 States.pdf

- Breitbart Sharers smartmatic.xlsx
- BuzzSumo Smartmatic Articles.xlsx
- Data Sources _ Infegy Help Center.pdf
- Impressions (Overview tab) _ Infegy Help Center.pdf
- Infegy August 2019 Posts.xlsx
- Infegy Dominion Posts.xlsx
- Infegy Dominion Post Texts.xlsx
- Infegy Engagement Count.xlsx
- Infegy Hugo Chavez Searches.xlsx
- Infegy Hugo Chavez Engagement.pdf
- Infegy - Posts August 15 2020.xlsx
- Infegy Posts Count.xlsx
- Infegy Pre-Election Numbers.xlsx
- Infegy Pre-Election Posts.xlsx
- Infegy Universe Counts.xlsx
- Infegy Universe of Posts.xlsx
- Reach Metric (Overview tab) _ Infegy Help Center.pdf
- The Infegy Glossary _ Infegy Help Center.pdf
- Volume Metrics _ Infegy Help Center.pdf

Google Analytics Metrics

- Americas Future Marxist Tyrant Maduro Looks to Capture National Assembly.pdf
- Arizona Voter Fraud Witness Army Col Phil Waldron Confirms Experts Saw Dominion.pdf
- BLAST FROM THE PAST Smartmatic CEO Introduces Creepy Bill Gates.pdf
- BOOM Attorney Sidney Powell Confirms Am Hearing That It Was Our Forces.pdf
- BOOM SIDNEY POWELL DROPS MOAB An Algorithm Was Plugged In.pdf
- BREAKING Fox News Cancels Lou Dobbs Show.pdf
- Breaking GEORGE SOROS Appoints Lord Mark Malloch Brown.pdf
- Democrats Announce Plan to Protect US Elections.pdf
- Democrats Stimulus Bill Also Sends Millions to the Communist Maduro Regime.pdf
- Dominion Files 1 3 Billion Defamation Lawsuit Against Sidney Powell.pdf
- Dominion Voting Machines ALL INCLUDE Weighted Race Feature.pdf
- Dominion Voting Machines Are Related to Smartmatic Sequoia Machines.pdf
- Dominion Voting Systems Connecting the Dots.pdf
- EXCLUSIVE Michigan Witness Melissa Carone Dominion CEO John Poulos LIED to Michigan Senate.pdf
- EXCLUSIVE Read the Explosive Report on Dominion Voting Systems by the Trump Team.pdf
- EXCLUSIVE The Dominion Voting Machines Dont Even Provide Candidate Vote Totals.pdf
- FLASHBACK Lou Dobbs on CNN in 2006 Smartmatic Based in Venezuela Sold to Sequoia.pdf
- FLASHBACK MSNBC in 2019 Reports on HOW EASY IT IS to Hack Dominion Software.pdf
- Former Filipino Lawmaker and Attorney Says Smartmatic Pre Loaded Machines.pdf
- HUGE Attorney Sidney Powell CONFIRMS Alleged Dominion Servers in Germany Were Confiscated.pdf
- MORE FROM SIDNEY POWELL Dominion, Smartmatic and China Involved.pdf
- Scytl Company Website Crashes.pdf
- Should Be Scads of Evidence of Frankly an International Criminal Conspiracy.pdf
- Sidney Powell calls on Dominion Voting Systems Employees to Step Forward.pdf
- SIDNEY POWELL Drops a BOMB on Mark Levin Show We Have Witness.pdf
- Sidney Powell Is Working on RICO Case Against Dominion and Smartmatic.pdf
- Sidney Powell Smartmatic Voting Machines Chairman of the Board Peter Neffenger.pdf
- Smartmatic Denies Transfer of Technology to Dominion Voting Systems.pdf
- Smartmatic Director Admitted in 2017 that Their System Was Able to Create.pdf
- Smartmatic Lied Lord Mark Malloch Brown Admitted to License Agreement.pdf
- Texas County Goes Blue for the First Time Since 1964.pdf
- Theyre Scared of Me and They Should Be Dominion Whistleblower Says CEO Lied During Michigan Testimony.pdf
- UPDATE Lies on Top of Lies Simple Math Proves Numbers Dont Add Up.pdf
- We Got It Newsmax Reporter Emerald Robinson National Security Source Confirms.pdf

- Welcome AMERICA To the Venezuela Election Experience.pdf
- Were Fixin to Overturn the Results of the Election in Multiple States.pdf
- What Is Bill Barr Going to Do.pdf
- WHAT Rudy Giuliani Says Votes Were Sent Out Of Country And Counted By Company From Venezuela.pdf
- Wikileaks Soros Linked Voting Machines Now Used in 16 States.pdf
- Wikileaks Soros Linked Voting Machines Now Used.pdf

PETER KENT
INTERNET EXPERT WITNESS
399 E Bayaud Ave., Denver CO 80209 ♦ 720-771-3246
Peter@PeterKentConsulting.com ♦ www.PeterKentConsulting.com

Summary of Qualifications
28 Years' Experience in all Aspects of Online Marketing:

- Search Engine Optimization (SEO)
- Search Engine "Link" Campaigns
- Pay Per Click (PPC) Search-Engine Advertising
- Affiliate Marketing
- Online PR
- Online Advertising
- Social Networking
- Social Media Marketing

- Online Review Management
- E-commerce Site Development
- Web Site Development
- Web Application Development
- E-mail Newsletter Publishing
- Web Project Management
- User Interface Design
- Improving Online "Conversions"
- Amazon Marketplace Merchandising
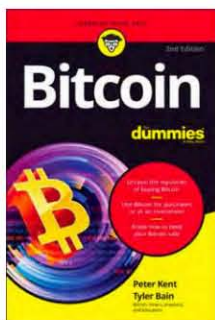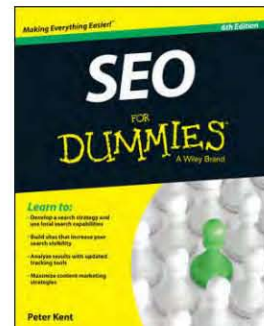
## Bitcoin, Cryptocurrency, & Blockchain Experience
- *Bitcoin for Dummies*, 2nd Edition
- Author/Presenter of *Crypto Clear: Blockchain and Cryptocurrency Made Simple* 8-hour online video course
- *Cryptocurrency Mining for Dummies* (2 editions)
- Consulting with U.S. Congress via Catalyst Research Institute
- Co-founder, DAOTEK, a Decentralized Autonomous Organization "operating system"

Expert Witness Experience   [Complete list on request]
- ~150 Cases over 27+ years • Court Testimony: 15 • Depositions: 56
- Patent, Trademark, Copyright, Contract Dispute, Copyright, Unfair Business Practice & Defamation cases related to Internet Technology/Digital Marketing
- Cases related to Pay Per Click (PPC) Advertising, Search Engine Optimization (SEO), Cybersquatting, Fake & Defamatory Online Reviews, Defamation in Web Sites & Social Media, Trademark Infringement through PPC and SEO, Amazon "Hijacking" & "Knockoffs," Amazon "Stream of Commerce," Search Result Hijacking, Lead Generation & Incentivized Traffic, Web-Site Management, Web Development, Cryptocurrency

Publications
- Best-selling author of the *Complete Idiot's Guide to the Internet*, *Search Engine Optimization for Dummies*, *Pay Per Click for Dummies Search Engine Marketing*, *Poor Richard's Web Site* and *Poor Richard's Internet Marketing and Promotions*, and dozens of other Internet-related books over the last 24 years.
- An award-winning technology column in two Colorado Newspapers for over 11 years; hundreds of periodical articles
- Staples.com's E-commerce Expert
- 5 Lynda.com & Udemy video training courses on SEO & Selling Through Amazon

KENT-0049
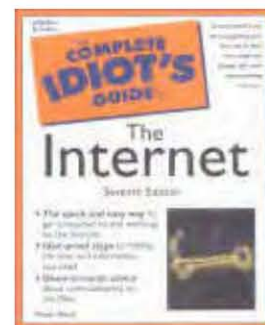
Business Experience

- Extensive online experience (bulletin boards and online services), dating back to 1984
- Working on the Internet since 1993
- Working with software development teams since 1981…cyberspace-software development since 1991
- Founder of an e-business service provider, funded by Softbank/Mobius, one of the world's largest venture-capital firm
- General Manager/Architect of a large site for a consortium of seven law firms; the site had 400,000+ pages, with sophisticated content-management and lead-management utilities running behind the scenes
- Founded a publishing company, with e-commerce sales, in 1997
- VP of Web Solutions for a national ISP
- VP of Marketing for a Web-development company
- Consulting services for scores of companies, large and small: Amazon, Zillow, Avvo, Lonely Planet, Honey Baked Ham, & hundreds of small and medium companies in a wide range of industries: furniture, scaffolding, medical-transcription service, financial services, law, real-estate, and much more.

Public Speaking

Extensive public speaking: 100+ radio show guest appearances, 30 years of speaking engagements, including seminars, panels, workshops, teleseminars, etc.

Summary of Qualifications

Experience in all aspects of online marketing—search-engine optimization, search-engine advertising, affiliate programs, online PR, etc.—along with more traditional offline marketing. A background in book publishing and technology, including e-commerce development, product development and management, user-interface design, software-product design, consumer research, training, and documentation. Founded an e-commerce service provider funded by the world's largest VC firm, and an "online enabled" publishing company, Top Floor Publishing, in the late '90s. An accomplished public speaker and author of dozens of books about the Internet and online marketing, including several best sellers.

Skills and Accomplishments

- Employed search-engine marketing to triple the revenues of a computer-peripherals company in less than12 months.
- Employed Web design and search-engine marketing to jump-start sales for an online scaffolding company. Increased revenues from $10,000/mth to $700,000/mth in a year
- Generated 75% of revenues for a Denver-based real-estate startup through search-engine advertising campaigns.
- Built a partnership with one of North America's largest publishers to deliver software to bookstores throughout the U.S.
- Raised $4M from Softbank/Mobius for an e-business service provider, later sold to iBoost.
- Founded a computer-book publishing company, with revenues exceeding $300,000 in the first year.

- Used low-cost, online/offline PR and guerrilla marketing techniques to position a book on the Amazon.com best-seller list, to promote another book into becoming the most widely reviewed and praised title in computer-book history, and to build the *Poor Richard's* series brand.
- Author of the best selling *Complete Idiot's Guide to the Internet* (7 editions, 1993 – 2000), *Search Engine Optimization for Dummies* (6 editions since 2004), and *Pay Per Click for Dummies Search Engine Marketing* (2006)
- Integrated 12 Web-development/hosting teams—with 65 staff in 10 different cities—into a single division.
- Provided strategic/technical analysis to the CEO/executive team regarding acquisitions.

Professional Experience
Peter Kent Consulting   Denver, CO: 2002 – Present
Principal
Providing Internet channel-management and Internet-marketing and -strategy consulting services to a varied client base. Current services include assisting clients in developing online-marketing strategies, increasing traffic through search-engine marketing and optimization, designing and implementing Pay per Click search-advertising campaigns, designing Web-sites, developing Web-applications, revenue-transaction conversion, and affiliate-program development. Clients include Burg Simpson Eldridge Hersh Jardine PC (a major Denver law firm), RoyalYarns.com (an online wool/handicrafts retailer), Peripheral Manufacturing (used search-engine marketing to triple revenues in under 12 months); ScaffoldMart.com (helped this stalled operation restart, increasing sales 7,000 percent); Shane Co. (repositioned this jeweler's online marketing strategy); Aestiva, Inc. (significantly increased sales revenue over a 9-month period); Jones University (designed and developed a strategic plan for optimization of the Web site and improved search-advertising results); and SavingStreet.com (implemented a pay-per-click search-advertising campaign for this startup real-estate company, generating 75% of their initial revenues). In addition to working with literally hundreds of small businesses, assisted a number of large companies such as Amazon.com, Lonely Planet, Zillow, Honey Baked Ham, Avvo, Time Warner Cable, & TowerRecords.com.

BuyBak, LLC
VP of Corporate Development, Co-Founder   Denver, CO: July 2010 – 2016
Business development and software development. Buybak was a startup in the rapidly growing "buyback" or "recommerce" business, buying used CDs, DVDs, video games, laptops, smart phones, and other electronics, and returning used products to the retail market (wholesale and through an Amazon Marketplace store). Partners included Newegg, Best Buy, and Walmart.

LeadNation, LLP
Founder, CEO   Philadelphia, PA: July 2009 – January 2011
Co-founder of a firm creating premium Web sites for medical clinics, along with ancillary services that helped them generate and manage business leads.

DNAML, Pty
Sr. VP, United States   Denver, CO: August 2007 – June 2008
Helped this Australian digital-publishing company with business-development campaigns, introducing the company to some of the world's largest publishers in New York and London. Helped the company develop relationships with publishers such as Wiley, McMillan, Hachette, Random House, Harper Collins, Elsevier, and others.

Indigio Group   Denver, CO: 2001 – 2003
Vice President Marketing

A Web-applications development and Internet-marketing-strategy consulting company with clients such
as Budget Rent a Car, Cendant, North American Van Lines, Orbis, and Dex Media. Direct responsibilities
included the production of strategic marketing plans and materials, overseeing all marketing products,
new-business sales development, and Internet marketing-strategy development for clients. Also liaised
with key clients and directed all public relations and advertising campaigns. Ensured significant press
coverage for the Company, greatly increasing its visibility in Colorado.

Internet Commerce & Communications   Denver, CO: 2001
Vice President Web Solutions

A national Internet Service Provider and Web-hosting company. Developed and implemented a strategic
plan to merge a dozen geographically dispersed Web-design and Web-hosting divisions acquired during
the prior 18 months. Managed a team of 60+ staff members providing Web Development, Web hosting,
Internet marketing, and e-commerce applications to thousands of small and medium-sized businesses in
an ASP (Application Service Provider) mode. The division produced revenues of approximately $8M in
2001. In addition, introduced new tools, processes and procedures to improve the department's efficiency
and reduce overhead, and designed a number of new ASP products—e-commerce and e-mail
publishing—for introduction to the small-business market.

BizBlast.com   Denver, CO: 1998 – 2001
Co-Founder

An E-Business Service Provider, delivering e-commerce services to small and medium-sized firms on a
monthly subscription basis, when doing business online was still relatively new and difficult for most
companies. Developed the original business plan and marketing strategy, including raising the company's
$4M first-round investment, led by one of the world's largest VC firms, SoftBank/Mobius. Researched
the market to evaluate the competition and developed the original product design, including user-interface
design and managing focus groups. Developed the company's marketing and offer strategy and identified
target markets and subscriber-acquisition programs. Business-development role included negotiating
distribution partnerships, including one with Macmillan USA to deliver BizBlast software to bookstores
throughout North America, and sought out partnerships to provide more products and services to BizBlast
clients, such as the PayPal relationship that provided another transaction method for BizBlast clients (the
first PayPal-enabled ecommerce system on the market).

Top Floor Publishing   Denver, CO: 1997 – 2003
Founder, President

A publisher of highly regarded books related to online business and marketing, written by industry
experts. The company's first book became the most widely reviewed and praised title in computer-book
history, and the third was an Amazon.com best seller. Created the company's marketing strategy and
managed all marketing and public relations campaigns. Built a brand—the *Poor Richard's* series—that
quickly became well known and respected in the computer-book industry. Managed all aspects of the
organization, including overall budget responsibility, product development, and co-op advertising.
Devised an online-marketing strategy that turned this startup into a widely distributed and well-known
publisher in the industry, and built the company's e-commerce system.

Kent & Associates   Dallas, TX & Denver, CO: 1986 – 1996
Independent Consultant

Services included creating documentation, training users, testing software, designing software user
interfaces, carrying out software consumer research and market intelligence, for a wide range of client
companies and industries. Clients included Semiotix (software development), The Pipeline (Internet
service provider); MasterCard (financial services), Analytical Surveys, Inc. (aerial photography),
Comprehensive Software Solutions (stock trading), Amgen (pharmaceuticals), SpectraLink
(telecommunications), Clinical Reference Systems, Inc. (medical), Ericsson, NEC, Northern Telecom

(telecommunications), and Genioss/Data General (computing/telecommunications). Used online services for general business communications and marketing as early as 1986.

Core Laboratories Int'l, Inc.
Systems Analyst   Dallas, TX: 1982 – 1986
Area Supervisor   Mexico: 1979 – 1982

An oil-field services company. Assisted in the development of the company's new generation of drilling-analysis computer technology. Tested software, designed the user interfaces, and worked closely with the software-development team to create a user-friendly software process flow. Responsible for all customer research and liaison. Planned software product enhancements based on evaluation of users' needs and competing products. Trained users and managed staff installing and maintaining the equipment. Previously worked in Mexico, with advanced computer technology on off-shore oil rigs, gaining experience in technology at a time when most people had little or no contact with computers. Lived and worked in Colombia, Mexico, Venezuela, Ecuador, Australia, North Sea, etc. Used data-acquisition/manipulation computers to provide geological and engineering reports to client oil companies. Core Labs' youngest-ever Unit Supervisor; fastest ever promotion to Logging Supervisor, with responsibility for the company's $2M annual Mexican operation.

Publishing Experience

Involved in the computer-book publishing business since 1988. Author of around 60 technology and business books including the best-selling *Complete Idiot's Guide to the Internet, Search Engine Optimization for Dummies, Pay Per Click Search Marketing for Dummies*, and *Bitcoin for Dummies* (Wiley). Author and publisher of the *Poor Richard's Web Site* and *Poor Richard's Internet Marketing and Promotions*. Founder of Top Floor Publishing. Author of hundreds of newspaper and magazine articles on business and technology, including a long-standing column in the Boulder County Business Report and the Northern Colorado Business Report.

Public Speaking

An accomplished speaker on a wide range of subjects. Speaking engagements have included the subject of Internet marketing for over 20 years, to organizations such as the National Association of Broadcasters, Vistage, and the Colorado Tourism Conference. Other topics include search-engine marketing and advertising, publishing, and general online-business issues. Guest speaker on over 100 radio shows.

Books

- *Bitcoin for Dummies* (2nd Edition, w/Tyler Bain. John Wiley, 2022)
- *Cryptocurrency Mining for Dummies* (2 Editions w/Tyler Bain. John Wiley, 2019/2022)
- *Cryptocurrency All-in-One for Dummies* (contributor, 2021)
- *Search Engine Optimization for Dummies* (John Wiley: 7 editions, beginning in 2004)
- *Pay Per Click Search Engine Marketing for Dummies* (John Wiley, 2006)
- *Coronavirus & COVID-19: What It Is, How to Avoid It, How to Survive It* (Kindle, self)
- *How to Make Money Online with eBay, Yahoo!, and Google* (McGraw-Hill Osborne Media, 2005)
- *The Word 2003 Bible* (John Wiley, 2003)
- *Poor Richard's Web Site: Geek-Free, Commonsense Advice on Building a Low-Cost Web Site* (Top Floor Publishing—most widely reviewed & praised title in computer-book history)
- *The CDnow Story: Rags to Riches on the Internet* (w/Jason and Matthew Olim, the founders of CDnow—Top Floor Publishing)
- *Poor Richard's Internet Marketing and Promotions: How to Promote Yourself, Your Business, Your Ideas Online* (w/Tara Calishain—Top Floor Publishing)

- *The Complete Idiot's Guide to the Internet* (7 editions, published by Que—on the Publisher's Weekly, Barnes & Noble, Software Etc., Baker & Taylor, and Ingrams computer-book best-seller lists; 100,000 copies sold in first 9 months)
- *The Complete Idiot's Guide to the Internet: UK Edition* (Prentice Hall, 3 editions)
- *Careers for Kids who Love Computers* (Facts on File)
- *The Official Netscape JavaScript 1.2 Book* (Netscape Press)
- *The Official Netscape JavaScript Programmer's Reference* (Netscape Press)
- *The Official Netscape JavaScript Book* (Netscape Press)
- *Using Netscape Communicator 4* (Que)
- *Using Netscape 3* (Que)
- *Using Netscape 2 for Windows 95* (Que—bestseller)
- *Using Netscape 2 with Your Mac* (Que)
- *Discover Windows NT Workstation 4* (IDG)
- *Discover FrontPage 97* (IDG)
- *Making Money in Technical Writing* (Macmillan/ARCO)
- *Using the Microsoft Network* (Que)
- *The Official Netscape JavaScript Book* (Netscape Press)
- *Using Microsoft Internet Explorer* (Que)
- *PGP Companion for Windows* (Ventana)
- *The 10 Minute Guide to the Internet* (Que)
- *The Complete Idiot's Next Step with the Internet* (Que)
- *The Complete Idiot's Guide to the World Wide Web* (Que)
- *The Complete Idiot's Guide to the Internet with Windows 95* (Que)
- *Using Mosaic* (Que—contributed several chapters and acted as a technical advisor)
- *Peter Norton's Windows NT: Tips & Tricks* (Random)
- *Peter Norton's User's Guide to Windows 3.1* (Bantam/Random)
- Peter Norton's *Outside the IBM PC and PS/2* (Brady—contributed 3 chapters)
- *The Technical Writer's Freelancing Guide* (Sterling Publishing)
- *Mastering Micrografx Designer*, and *Mastering Micrografx Designer 3.1* (SYBEX)
- *Learn Microsoft Money Fast!* (SYBEX)
- *Understanding Windows Draw* (SYBEX)
- *Shareware Treasure Chest: Clip Art Collection* (SYBEX)
- *The Illustrated Enable/OA* (Wordware)

Kent's work has also appeared in the following books:

- *The Ten Minute Guide to Internet Explorer* (Que)
- *Netscape Navigator 3 Starter Kit* (Que)
- *Using Netscape Navigator 3 Special Edition* (Que)
- *Using Windows 95, Special Edition* (Que)
- *Using The Internet, Special Edition* (Que)
- *The HTML Programmer's Reference* (Ventana)
- *Carol Vorderman's Guide to the Internet* (Prentice Hall, 3 editions)
- *UK Internet Starter Kit* (Prentice Hall, 3 editions)

Video Courses
- *Analyzing Your Web Site to Improve SEO* (Lynda.com/LinkedIn Learning)
- *SEO Link Building* (Lynda.com/LinkedIn Learning)
- *SEO: Link Building in Depth* (Lynda.com/LinkedIn Learning)

KENT-0054

- *Selling on the Amazon Marketplace* (Lynda.com/LinkedIn Learning)
- *Complete SEO Training* (Udemy)
- *Crypto Clear: Blockchain & Cryptocurrency Made Simple* (Self-published/hosted)

Articles in the Following Newspapers/Periodicals

Internet Law & Strategy	North Colorado Business	VBAC News
Examiner.com	Report	The Parent Newsmagazine
The Manchester Guardian	Men's Journal	Kids Today
Website Magazine	The Dallas Times Herald	First Coast Parent
Staples.com	Software Maintenance	Jacksonville Parent
Computerworld	News	Carolina Parent
eBusiness Journal	LaserLink	All About Kids
Internet World	NetBITS	My Business
Windows User	Writers Write	PD News
Windows Magazine	Colorado Computer	Computer Book Cafe
Dr. Dobb's Journal	Diskovery	Employee Relations
Boulder County Business	Metropolitan Ski Times	Bulletin
Report	Sm@rtPartner	Onvia.com

Public Speaking

- Scores of presentations, workshops, and keynotes to business groups and corporations
- Wide range of subjects: Blockchain & Cryptocurrency, SEO, Online Marketing, Online Reviews, Web Development, Designing an Online Marketing Strategy, eBook Publishing, Self Publishing, and much more
- Guest on around 100 radio shows: 60 - 80 Radio interviews, including in-studio interviews in the widely syndicated *Into Tomorrow* and *The World Wide Web Radio Show*.
- August 2005: 20 Radio interviews in one day, with a total audience of over 20M people, related to search engine technology. (Audioline Network national syndication, WZEZ Richmond VA, KLKS St Cloud MN, KYW Philadelphia, WSNY Columbus OH, WOCA Gainsville FL, Business Talk national syndication, USA Radio Network national syndication, WFIN Toldo OH, KCMN Colorado Springs, ABC Radio Network national syndication, Cable Radio Network national syndication, WLW Cincinnati OH, WZON Bangor ME, KTSA San Antonio TX, WSBA Harrisburg PA, WVNU Cincinnati OH, KAHI Sacramento CA, AURN national syndication, Metro syndication Minneapolis MN, KMOX St Louis MO)

Reviews

My business is advice ... whether I'm writing, consulting, or working to achieve my employer's goal, that's what I do, help people understand how to work online. And I'm glad to say people like what I've got to say ...

CNN.com	If you really want to build a functional Web site but don't have a lot of money or think you don't have enough skill, "Poor Richard's Web Site: Geek-Free, Commonsense Advice on Building a Low-Cost Web Site" might just be the book for you. **Jonathon Austin,** *CNN Interactive*
The Seattle Times	[helps] guide you through this step and others involved in getting a Web site up and running. **Patrick Marshall,** *Seattle Times*
amazon.com	**Poor Richard's Good Advice** With all great new things comes a proliferation of hucksters and snake-oil salesmen, and the Internet is no exception. The antidote to this swirl of confusion lies in Peter Kent's *Poor Richard's Web Site*. The analogy to Ben Franklin's volume is appropriate: the book is filled with the kind of

straightforward information the Founding Father himself would have appreciated. **Jennifer Buckendorff, Amazon.com**

I've found a great book that explains it all: Poor Richard's Web Site. … This is a practical, no-nonsense guide that lucidly covers topics like how to set up a domain with the InterNIC, how to promote your Web site and how to actually use all those features that hosting services provide. **David Methvin, *Windows Magazine***

Hot Site ... Let Peter Kent provide what he calls "geek-free, commonsense advice" on building a low-cost site on the Web. *USA Today Web site*

Book of the Month
Jerry Pournelle, *BYTE Magazine*

We liked the level of rich, high-quality details that went into this publication. You can tell that Kent has poured all of his creative energies into the project. Yet he remained focused enough throughout the book to clearly define in plain English all of the technical information required to create and maintain a Web site. ... **We highly recommend this book.   Peter Cook and Scott Manning, *Philadelphia Inquirer***

Covering all the basics in jargon-free English, he considers what you need to start, where to put your Web site, finding a host, how to pick and register a domain name, creating a site, choosing an editor, adding interaction and taking orders online, distribution lists, and registering your Web site. **Very well written**. *Library Journal*

Book of the Month.
There was no question this month; *Peter Kent's Poor Richard's Web Site*, **a remarkable book whose subtitle tells it all**, is the undisputed Book of the Month winner. In clear, understandable language, Kent conveys an absolutely incredible amount of information on building and running a Web site. **Richard Mann, *ComputerCredible Magazine***

If you're gearing up to launch a Web site or you're looking to take an existing site to the next level, Poor Richard's offers clear advice to help you defend against jargon-happy sales people and computer magazines. **Alan Joch, *Fortune.com***

Want to set up a Web site but don't know where to begin? Get yourself a copy of Peter Kent's *Poor Richard's Web Site*.
PC World

... an encyclopedic treatment of every aspect—technical, financial, moral and social—of building and maintaining a Web site. It packs **more sound advice into a slender 424 pages than far bulkier and expensively-promoted books.** Author Peter Kent writes with vivacity and real expository skill. In his hands, technical subjects such as email forwarding and host selection become compelling reading.
Cameron Laird & Kathryn Soraiz, *Web Server Online Magazine*

[A] good source [of information] with easy step-by-step directions is Peter Kent's *Poor Richard's Web Site*.
Jenna Schnuer, *Publisher's Weekly*

And many more ...
Smartbooks.com, CMPNet's Techweb, Marketing Technology, Publishing for Entrepreneurs, Vancouver Business Journal, Computer Literacy Bookshops/Fatbrain, Printing News, Hill Times, MicroTimes, Entropy Gradient Reversals, Boardwatch, Home Office, San Diego Union-Tribune ... etc., etc.

8